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 Peggy Roman-Jacobson, SBN 210853  
 2 SCHONBRUN De SIMONE SEPLOW  
 HARRIS & HOFFMAN LLP  
 3 414 S. Marengo Avenue  
 Pasadena, CA 91101  
 4 (626) 440-5969  
 (626) 449-4417 facsimile  
 5 Wharris@sdshhlaw.com  
 PRJacobson@sdshhlaw.com

6 Attorneys for Plaintiff ALTHEA LEDFORD, individually,  
 7 and as the successor in interest of MARK A. LEDFORD, deceased

8 UNITED STATES DISTRICT COURT  
 9 CENTRAL DISTRICT OF CALIFORNIA

11 ALTHEA LEDFORD, individually,  
 and as the successor in interest of  
 12 MARK A. LEDFORD, deceased,

13 Plaintiff,

14 v.

15 CITY OF INGLEWOOD,  
 INGLEWOOD POLICE  
 16 DEPARTMENT, FORMER CHIEF  
 OF POLICE RONALD BANKS,  
 17 OFFICERS RODRIGUEZ and  
 BALDONADO, and DOES 1 to 10,

18 Defendants.  
 19

) Case No. CV06-06796 CAS

) PLAINTIFF'S RULE 26  
 ) INITIAL DISCLOSURES

20  
 21 **RULE 26(a)(1)(A): WITNESSES**

| 23 No. | Witness   | Address/ Phone  |
|--------|---|---|
| 24 1.  | Althea Ledford, Plaintiff   | c/o Schonbrun, DeSimone,<br>25 Seplow, Harris & Hoffman,<br>LLP, 414 s. Marengo Ave., Los<br>Angeles, CA 91101<br>26 (626) 440-5969 |
| 27 2.  | Demetrius Anthoni Mitchell,<br>28 Witness (son of Althea Ledford) | 119 W. 64 <sup>th</sup> Place, Apt. 4,<br>Inglewood, CA 90302<br>(310) 218-8333   |

1. **EXHIBIT "A"**

- 1 3. Dr. Yulai Wang, M.D., Deputy  
2 Medical Examiner  
3 County of Los Angeles,  
4 Department of Coroner  
5 1104 N. Mission Road  
6 Los Angeles, CA 90033  
7 (213) 343-0512
- 4 4. Joseph J. Muto, Chief of Forensic  
5 Laboratories, County of Los  
6 Angeles, Department of Coroner  
7 1104 N. Mission Road  
8 Los Angeles, CA 90033  
9 (323) 343-0530  
10 email: [jmuto@lacoroner.org](mailto:jmuto@lacoroner.org)
- 11 5. Detective Kevin Lane, Inglewood  
12 P.D., Homicide Section  
13 Inglewood P.D., Homicide  
14 Section, One Manchester Blvd.,  
15 P.O. Box 6500, Inglewood, CA  
16 90312  
17 (310) 412-5246
- 18 6. Dr. Yarnell (found or pronounced  
19 Mark Ledford dead)  
20 Unknown at this time, discovery  
21 continues.
- 22 7. Alexander P. Perez, transported  
23 decedent Mark Ledford to Los  
24 Angeles County Coroner and  
25 conducted personal effects  
26 inventory and entries on evidence  
27 log  
28 County of Los Angeles,  
Department of Coroner  
1104 N. Mission Road  
Los Angeles, CA 90033  
(213) 343-0512
8. Sherwood J. Dixon, Investigator,  
County of Los Angeles,  
Department of Coroner  
County of Los Angeles,  
Department of Coroner  
1104 N. Mission Road  
Los Angeles, CA 90033  
(213) 343-0512
9. Officer Dohmann, Inglewood P.D.  
Inglewood P.D.  
One Manchester Blvd., P.O. Box  
6500, Inglewood, CA 90312,  
(310) 412-5211
10. Officer Manning, Inglewood P.D.  
Inglewood P.D.  
One Manchester Blvd., P.O. Box  
6500, Inglewood, CA 90312,  
(310) 412-5211
11. Cheryl MacWillie, Reviewing  
Investigator, County of Los  
Angeles, Department of Coroner  
County of Los Angeles,  
Department of Coroner  
1104 N. Mission Road  
Los Angeles, CA 90033  
(213) 343-0512
12. Officer Louis Rodriguez,  
Defendant  
Inglewood P.D.  
One Manchester Blvd., P.O. Box  
6500, Inglewood, CA 90312

- |     |  |   |
|-----|--|---|
| 13. | Officer Vincent Baldonado,<br>Defendant  | Inglewood P.D.<br>One Manchester Blvd., P.O. Box<br>6500, Inglewood, CA 90312                                   |
| 14. | Chief Ronald Banks (former)  | Unknown at this time, discovery<br>continues.   |
| 15. | Unknown medical personnel at<br>Daniel Freeman Hospital  | Daniel Freeman Hospital,<br>Inglewood Branch<br>333 N. Praire Avenue,<br>Inglewood, CA 90301, (310)<br>419-8246 |
| 16. | Unknown paramedic personnel<br>who responded to decedent   | Unknown at this time, discovery<br>continues.   |
| 17. | 911 Operator responding to request<br>for medical assistance prior to<br>phone call to Inglewood P.D.<br>resulting in dispatch of police | Unknown at this time, discovery<br>continues.   |
| 18. | Inglewood Police Department<br>dispatcher  | Inglewood P.D.<br>One Manchester Blvd., P.O. Box<br>6500, Inglewood, CA 90312                                   |

#### **RULE 26(a)(1)(B): DOCUMENTS**

\* All documents identified below are in the care, custody and control of Plaintiff's attorneys of record, Schonbrun, DeSimone, Seplow, Harris & Hoffman, LLP, except where indicated.

| No. ID | Identification/Category of Document  |
|--------|--|
| 1.     | Copy of County of Los Angeles Death Certificate for Mark Ledford (original death certificate is in the care, custody and control of Althea Ledford)          |
| 2.     | Los Angeles County Coroner Autopsy Report drafted by Yulai Wang, M.D., Deputy Medical Examiner (dated March 18, 2005).                                       |
| 3.     | Los Angeles County Coroner Forensic Science Laboratories toxicology Report drafter by Joseph J. Muto, Chief, Forensic Laboratories (dated November 24, 2004) |
| 4.     | Los Angeles County Coroner Case Report and Investigator's Narrative drafted by Sherwood Dixon, Investigator (dated November 2, 2004)                         |
| 5.     | Los Angeles County Coroner Investigator's Case Assignment Form (dated November 1, 2004)  |
| 6.     | Los Angeles County Coroner Evidence Log and Personnel Effects Inventory (dated November 1, 2004)   |

7. Los Angeles County Coroner Hospital and Nursing Care Facility Report (undated)
8. Business Card from Detective Kevin Lane

**RULE 26(a)(1)(C): DAMAGES**

- A. Plaintiff has suffered substantial economic and non-economic damages and has experienced severe emotional distress and mental injuries as a result of witnessing the brutal death of her husband at the hands of law enforcement. Plaintiff was wrongfully deprived of love, comfort, society, affection and services arising from her relationship with her husband and Mr. Ledford was wrongfully deprived of his enjoyment of life. In addition, Mr. Ledford's estate is entitled to the pain and suffering he suffered prior to his death. The amount of such damages will be ascertained according to proof.
- B. Other compensatory and special damages, including, without limitation, loss of earnings, loss of earnings capacity, medical expenses, according to proof.
- C. Attorneys fees and costs through trial: unknown at this time.
- D. Punitive damages: according to proof.

///

Dated: March 2, 2007

SCHONBRUN DESIMONE SELOW  
HARRIS & HOFFMAN LLP

Wilmer J. Harris, Esq.  
Peggy Roman-Jacobson, Esq., Attorneys for  
Plaintiff ALTHEA LEDFORD

**PROOF OF SERVICE**

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am a resident of the aforesaid county, State of California; I am over the age of 18 years and not a party to the within action; my business address is 414 S. Marengo, Pasadena, California 91101

On **March 2, 2007**, I caused the service of the following document described as:

**PLAINTIFF'S RULE 26 INITIAL DISCLOSURES**

on all interested parties in this action by placing \_\_\_\_\_ an original or **X** a true copy thereof enclosed in sealed envelope addressed as follows:

**Taufiki D. Joshua, Esq.**  
**Assistant City Attorney**  
**Inglewood City Attorney's Office**  
**One Manchester Blvd. Ste. 860**  
**P.O. Box 6500**  
**Inglewood, CA 90312**

**Michael D. Allen**  
**Franscell, Strickland, Roberts &**  
**Lawrence, P.C.**  
**100 West Broadway**  
**Suite 1200**  
**Glendale, CA 91210**

       **[By Facsimile]** The facsimile machine I used complied with California Rules of Court, Rule 2006(d). I caused the machine to print a record of the transmission, a copy of which is attached to this declaration. I served the foregoing on the interested parties by use of a facsimile machine, telephone number (626) 449.4417, transmitting a true and correct copy to the following:

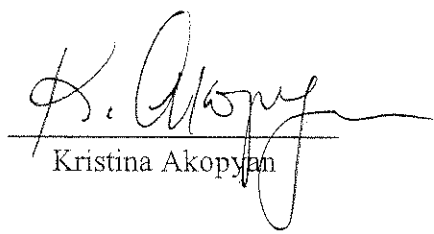
       **[By personal service]** I caused the above stated document to be delivered to the individuals listed above.

**X** **[By MAIL]** I caused such envelope to be deposited in the mail at Pasadena, California. The envelope was mailed with postage thereof fully prepaid.

Executed on **March 2, 2007**, at Pasadena, California.

**[State]** I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

**X** **[FEDERAL]** I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

  
 Kristina Akopyan





- 1 3. Dr. Yulai Wang, M.D., Deputy  
2 Medical Examiner  
3 County of Los Angeles,  
4 Department of Coroner  
5 1104 N. Mission Road  
6 Los Angeles, CA 90033  
7 (213) 343-0512
- 4 4. Joseph J. Muto, Chief of Forensic  
5 Laboratories, County of Los  
6 Angeles, Department of Coroner  
7 1104 N. Mission Road  
8 Los Angeles, CA 90033  
9 (323) 343-0530  
10 email: [jmuto@lacoroner.org](mailto:jmuto@lacoroner.org)
- 11 5. Detective Kevin Lane, Inglewood  
12 P.D., Homicide Section  
13 Inglewood P.D., Homicide  
14 Section, One Manchester Blvd.,  
15 P.O. Box 6500, Inglewood, CA  
16 90312  
17 (310) 412-5246
- 18 6. Dr. Yarnell (found or pronounced  
19 Mark Ledford dead)  
20 Unknown at this time, discovery  
21 continues.
- 22 7. Alexander P. Perez, transported  
23 decedent Mark Ledford to Los  
24 Angeles County Coroner and  
25 conducted personal effects  
26 inventory and entries on evidence  
27 log  
28 County of Los Angeles,  
Department of Coroner  
1104 N. Mission Road  
Los Angeles, CA 90033  
(213) 343-0512
8. Sherwood J. Dixon, Investigator,  
County of Los Angeles,  
Department of Coroner  
County of Los Angeles,  
Department of Coroner  
1104 N. Mission Road  
Los Angeles, CA 90033  
(213) 343-0512
9. Officer Dohmann, Inglewood P.D.  
Inglewood P.D.  
One Manchester Blvd., P.O. Box  
6500, Inglewood, CA 90312,  
(310) 412-5211
10. Officer Manning, Inglewood P.D.  
Inglewood P.D.  
One Manchester Blvd., P.O. Box  
6500, Inglewood, CA 90312,  
(310) 412-5211
11. Cheryl MacWillie, Reviewing  
Investigator, County of Los  
Angeles, Department of Coroner  
County of Los Angeles,  
Department of Coroner  
1104 N. Mission Road  
Los Angeles, CA 90033  
(213) 343-0512
12. Officer Louis Rodriguez,  
Defendant  
Inglewood P.D.  
One Manchester Blvd., P.O. Box  
6500, Inglewood, CA 90312

- |     |  |  |
|-----|--|--|
| 13. | Officer Vincent Baldonado,<br>Defendant  | Inglewood P.D.<br>One Manchester Blvd., P.O. Box<br>6500, Inglewood, CA 90312                                    |
| 14. | Chief Ronald Banks (former)  | Unknown at this time, discovery<br>continues.  |
| 15. | Unknown medical personnel at<br>Daniel Freeman Hospital  | Daniel Freeman Hospital,<br>Inglewood Branch<br>333 N. Prairie Avenue,<br>Inglewood, CA 90301, (310)<br>419-8246 |
| 16. | Unknown paramedic personnel<br>who responded to decedent   | Unknown at this time, discovery<br>continues.  |
| 17. | 911 Operator responding to request<br>for medical assistance prior to<br>phone call to Inglewood P.D.<br>resulting in dispatch of police | Unknown at this time, discovery<br>continues.  |
| 18. | Inglewood Police Department<br>dispatcher  | Inglewood P.D.<br>One Manchester Blvd., P.O. Box<br>6500, Inglewood, CA 90312                                    |

### **RULE 26(a)(1)(B): DOCUMENTS**

\* All documents identified below are in the care, custody and control of Plaintiff's attorneys of record, Schonbrun, DeSimone, Seplow, Harris & Hoffman, LLP, except where indicated.

- | <b>No. ID</b> | <b>Identification/Category of Document</b>   |
|---------------|--|
| 1.            | Copy of County of Los Angeles Death Certificate for Mark Ledford (original death certificate is in the care, custody and control of Althea Ledford)          |
| 2.            | Los Angeles County Coroner Autopsy Report drafted by Yulai Wang, M.D., Deputy Medical Examiner (dated March 18, 2005).                                       |
| 3.            | Los Angeles County Coroner Forensic Science Laboratories toxicology Report drafter by Joseph J. Muto, Chief, Forensic Laboratories (dated November 24, 2004) |
| 4.            | Los Angeles County Coroner Case Report and Investigator's Narrative drafted by Sherwood Dixon, Investigator (dated November 2, 2004)                         |
| 5.            | Los Angeles County Coroner Investigator's Case Assignment Form (dated November 1, 2004)  |
| 6.            | Los Angeles County Coroner Evidence Log and Personnel Effects Inventory (dated November 1, 2004)   |



- 1 7. Los Angeles County Coroner Hospital and Nursing Care Facility
- 2 Report (undated)
- 3 8. Business Card from Detective Kevin Lane
- 4 9. Althea Ledford's T-Mobile call detail on 10/31/04 at 11:22 pm to 911
- 5 Emergency; 10/31/04 call to information to obtain phone number for
- 6 Inglewood P.D. at 11:22 p.m.; 10/31/04 call to Inglewood P.D. at
- 7 11:24 p.m.

**RULE 26(a)(1)(C): DAMAGES**

- 8 A. Plaintiff has suffered substantial economic and non-economic
- 9 damages and has experienced severe emotional distress and mental
- 10 injuries as a result of witnessing the brutal death of her husband at the
- 11 hands of law enforcement. Plaintiff was wrongfully deprived of love,
- 12 comfort, society, affection and services arising from her relationship
- 13 with her husband and Mr. Ledford was wrongfully deprived of his
- 14 enjoyment of life. In addition, Mr. Ledford's estate is entitled to the
- 15 pain and suffering he suffered prior to his death. The amount of such
- 16 damages will be ascertained according to proof.
- 17
- 18 B. Other compensatory and special damages, including, without
- 19 limitation, loss of earnings, loss of earnings capacity, medical
- 20 expenses, according to proof.
- 21 C. Attorneys fees and costs through trial: unknown at this time.
- 22 D. Punitive damages: according to proof.

23 ///

24 Dated: March 16, 2007

SCHONBRUN DESIMONE SELOW  
HARRIS & HOFFMAN LLP

Wilmer J. Harris, Esq.  
Peggy Roman-Jacobson, Esq., Attorneys for  
Plaintiff ALTHEA LEDFORD

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am a resident of the aforesaid county, State of California; I am over the age of 18 years and not a party to the within action; my business address is 414 S. Marengo, Pasadena, California 91101

On **March 19, 2007**, I caused the service of the following document described as:

**PLAINTIFF'S SUPPLEMENTAL RULE 26 INITIAL DISCLOSURES**

on all interested parties in this action by placing \_\_\_\_\_ an original or **X** a true copy thereof enclosed in sealed envelope addressed as follows:

**Taufiki D. Joshua, Esq.**  
Assistant City Attorney  
Inglewood City Attorney's Office  
One Manchester Blvd. Ste. 860  
P.O. Box 6500  
Inglewood, CA 90312

**Michael D. Allen**  
Franscell, Strickland, Roberts &  
Lawrence, P.C.  
100 West Broadway  
Suite 1200  
Glendale, CA 91210

       **[By Facsimile]** The facsimile machine I used complied with California Rules of Court, Rule 2006(d). I caused the machine to print a record of the transmission, a copy of which is attached to this declaration. I served the foregoing on the interested parties by use of a facsimile machine, telephone number (626) 449.4417, transmitting a true and correct copy to the following:

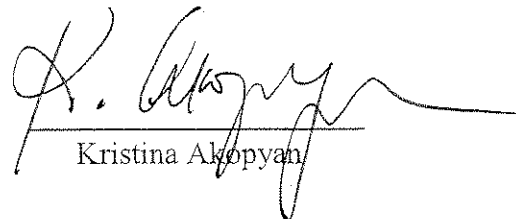
       **[By personal service]** I caused the above stated document to be delivered to the individuals listed above.

**X** **[By MAIL]** I caused such envelope to be deposited in the mail at Pasadena, California. The envelope was mailed with postage thereof fully prepaid.

Executed on **March 19, 2007**, at Pasadena, California.

       **[State]** I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

**X** **[FEDERAL]** I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

  
Kristina Akopyan

CAL P. SAUNDERS, State Bar No. 63497  
TAUFIKI D. JOSHUA, State Bar No. 207636  
OFFICE OF THE CITY ATTORNEY  
CITY OF INGLEWOOD  
1 Manchester Boulevard, Suite 860  
Inglewood, California 90301  
Telephone: 310-412-8672  
Facsimile: 310-412-8865

MICHAEL D. ALLEN, State Bar No. 198126  
FRANSCELL, STRICKLAND, ROBERTS & LAWRENCE, P.C.  
A Professional Corporation  
100 West Broadway, Suite 1200  
Glendale, California 91210-1219  
Telephone No. (818) 545-1925  
Facsimile No. (818) 545-1937

Attorneys for Defendants  
CITY OF INGLEWOOD, INGLEWOOD POLICE DEPARTMENT,  
OFFICERS RODRIGUEZ and BALDONADO, and RONALD BANKS

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

ALTHEA LEDFORD, etc., et al.,

Plaintiff,

vs.

CITY OF INGLEWOOD, et al.,

Defendants.

Case No. CV 06-06796 CAS (PLAx)  
Hon. Christina A. Snyder

**DEFENDANT CITY OF  
INGLEWOOD'S REQUEST FOR  
PRODUCTION OF DOCUMENTS  
AND THINGS PROPOUNDED TO  
PLAINTIFF ALTHEA LEDFORD,  
SET ONE**

PROPOUNDING PARTY: Defendant City of Inglewood

RESPONDING PARTY: Plaintiff Althea Ledford

Set Number: One

Pursuant to Fed.R.Civ.P. Rule 34, Defendant CITY OF INGLEWOOD  
requests that Plaintiff Althea Ledford produce no later than noon on May 17, 2007,  
at the law offices of Franscell, Strickland, Roberts & Lawrence, 100 West

1 Broadway, Suite 1200, Glendale, California 91210-1219, and permit defendant, or  
2 someone acting on its behalf, to inspect and copy the following documents and  
3 things, which are in plaintiff's personal possession, custody or control; or are in the  
4 possession, custody or control of plaintiff's agents.

5 **DEFINITIONS**

6 A. Whenever the term "INCIDENT" is used herein, it refers to the  
7 incident which gave rise to the lawsuit.

8 B. Whenever the term "IDENTIFY" is used herein, it means to provide  
9 the last known name, address and telephone number of the person or entity to which  
10 it pertains unless otherwise indicated.

11 **PLEASE NOTE THAT TWO SEPARATE ACTIONS ARE**  
12 **REQUIRED:**

- 13 1. Serve separate written responses within thirty (30) days;  
14 2. Produce documents and tangible things at the date, time and location  
15 indicated above.

16 **DOCUMENTS TO BE PRODUCED**

17 **REQUEST FOR PRODUCTION NO. 1:**

18 All documents evidencing income received by decedent Mark Ledford from  
19 January 1, 1995 up to and including the date of the incident, including but not  
20 limited to, paycheck stubs, W-2 forms, state and federal tax returns, and any other  
21 documentation demonstrating income generated by the decedent.

22 **REQUEST FOR PRODUCTION NO. 2:**

23 Documents evidencing income generated by plaintiff Althea Ledford from  
24 January 1, 1995 up to and including the date of the response to this request for  
25 production, including, but not limited to, paycheck stubs, W-2 forms, and state and  
26 federal tax returns.

27 **REQUEST FOR PRODUCTION NO. 3:**

28 Documents evidencing medical treatment received by plaintiff Althea

Ledford from January 1, 1995 up to and including the date of the response to this request for production.

**REQUEST FOR PRODUCTION NO. 4:**

Any and all documents which support the existence of any alleged emotional injuries suffered by plaintiff Althea Ledford as a result of the incident.

**REQUEST FOR PRODUCTION NO. 5:**

Any and all documents which demonstrate the amount and nature of each expense allegedly incurred by plaintiff Althea Ledford as a result of the incident.

**REQUEST FOR PRODUCTION NO. 6:**

Any and all documents which reflect any written otherwise recorded statement of any witness to the incident.

**REQUEST FOR PRODUCTION NO. 7:**

Any and all documents which identify all health care practitioners with whom decedent Mark Ledford consulted within the ten (10) years prior to the date of the incident, including but not limited to, medical doctors, chiropractors, physical therapists, psychiatrists and psychologists.

**REQUEST FOR PRODUCTION NO. 8:**

Any and all documents which identify all medical institutions with whom decedent Mark Ledford consulted as an in-patient or out-patient in the ten (10) years preceding the date of the incident, including but not limited to, hospitals, emergency rooms, clinics, convalescent hospitals, rehabilitation facilities, or hospices.

**REQUEST FOR PRODUCTION NO. 9:**

Any and all documents which reflect the date, arresting agency and offense(s) charged for each and every occasion on which defendant Mark Ledford was arrested within the ten (10) years preceding the date of the incident.

**REQUEST FOR PRODUCTION NO. 10:**

Any and all medical records for decedent Mark Ledford for the ten (10) years preceding the date of the incident.

1 **REQUEST FOR PRODUCTION NO. 11:**

2 County of Los Angeles death certificate for Mark Ledford.

3 **REQUEST FOR PRODUCTION NO. 12:**

4 Los Angeles County Coroner Investigator's Case Assignment form dated  
5 November 1, 2004, identified in plaintiff's Rule 26 disclosures.

6 **REQUEST FOR PRODUCTION NO. 13:**

7 Los Angeles County Coroner Hospital and Nursing Care Facility Report.

8 **REQUEST FOR PRODUCTION NO. 14:**

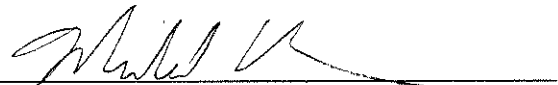
9 Business card from Detective Kevin Lane identified in plaintiff's Rule 26  
10 disclosures.

11 **REQUEST FOR PRODUCTION NO. 15:**

12 Althea Ledford's T-Mobile call detail on 10/31/04 at 11:22 p.m. to 911  
13 emergency; 10/31/04 call to Information to obtain phone number for Inglewood  
14 Police Department at 11:22 p.m.; 10/31/04 call to Inglewood Police Department at  
15 11:24 p.m. identified in plaintiff's Rule 26 disclosures.

16  
17 DATED: April 13, 2007

FRANSCCELL, STRICKLAND,  
ROBERTS & LAWRENCE, P.C.

18  
19  
20 By 

21 Michael D. Allen  
22 Attorneys for Defendants  
23 CITY OF INGLEWOOD, INGLEWOOD  
24 POLICE DEPARTMENT, OFFICERS  
25 RODRIGUEZ and BALDONADO, and  
26 RONALD BANKS  
27  
28



**PROOF OF SERVICE**

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I, Fely Yamane, am employed in the aforesaid County, State of California; I am over the age of 18 years and not a party to the within action; my business address is 100 West Broadway, Suite 1200, Glendale, CA 91210.

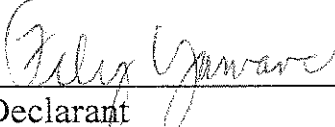
On April 13, 2007, I served the foregoing **DEFENDANT CITY OF INGLEWOOD'S REQUEST FOR PRODUCTION OF DOCUMENTS AND THINGS PROPOUNDED TO PLAINTIFF ALTHEA LEDFORD, SET ONE** on the interested parties in this action by placing a true copy thereof, enclosed in a sealed envelope, addressed as follows:

Wilmer J. Harris  
Peggy Roman-Jacobson  
Schonbrun DeSimone Seplow Harris & Hoffman  
414 South Marengo Avenue  
Pasadena, CA 91101

BY U.S. MAIL as follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice, it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at Glendale, California, in the ordinary course of business.

I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct, and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on April 13, 2007, at Glendale, California.

  
Declarant

1 Wilmer J. Harris, SBN 150407  
2 Peggy Roman-Jacobson, SBN 210853  
3 SCHONBRUN De SIMONE SEPLOW  
4 HARRIS & HOFFMAN LLP  
5 414 S. Marengo Avenue  
6 Pasadena, CA 91101  
7 Telephone: (626) 440-5969  
8 Facsimile: (626) 449-4417

9 Attorneys for Plaintiff  
10 ALTHEA LEDFORD, individually and as successor in interest for MARK  
11 LEDFORD, deceased

12 UNITED STATES DISTRICT COURT  
13 CENTRAL DISTRICT OF CALIFORNIA

14 ALTHEA LEDFORD, et al.

15 Plaintiff,

16 v.

17 CITY OF INGLEWOOD, et al.

18 Defendants.

No. CV 06-06796 ODW (PLAx)

**PLAINTIFF'S RESPONSES TO  
DEFENDANT'S NOTICE TO  
PRODUCE DOCUMENTS, SET  
ONE**

19 PROPOUNDING PARTY: Defendant CITY OF INGLEWOOD

20 RESPONDING PARTY: Plaintiff ALTHEA LEDFORD

21 SET NO.: One

22 Plaintiff hereby provides the following responses to the Defendants' Request  
23 for Production of Documents without prejudice to further discovery, reserving the  
24 right to present evidence of any subsequently discovered facts at the trial of this  
25 action.

26 GENERAL OBJECTIONS

27 The following general objections are made to each and every request and are  
28

1 **EXHIBIT "C"**

1 deemed to be incorporated into the specific objection and response provided to  
2 each request:

3       1. Plaintiff bases these objections and responses on the assumption that  
4 defendants in propounding these requests did not intend to seek information  
5 protected against discovery by the attorney-client privilege, the work-product  
6 doctrine or documents that contain or reflect the impressions, conclusion, opinion,  
7 legal research or theories of plaintiff's attorneys or his agents. To the extent that  
8 defendants' requests, or any part thereof, are intended to elicit such information,  
9 plaintiff objects thereto and asserts the privileges provided in and by the foregoing  
10 doctrines to the fullest extent permitted by law. Plaintiff further objects to these  
11 requests to the extent that they seek information or documents protected from  
12 disclosure by the right to privacy or any other applicable privilege. In addition,  
13 plaintiff objects to these requests in that they call for information beyond what  
14 defendants are entitled to under the Federal Rules of Civil Procedure.

15       2. Plaintiff further objects to these requests to the extent that they are  
16 overbroad and do not describe the documents sought with reasonable particularity.

17       Each of the following responses is rendered and based on information in the  
18 possession of the responding party at the time of the preparation of these answers,  
19 after diligent inquiry. Discovery will continue for as long as permitted by statute or  
20 stipulation of the parties, and the investigation of this responding party and agents  
21 will continue to and throughout the trial of this action. Plaintiff therefore  
22 specifically reserves the right, at the time of trial, to introduce any documentary  
23 evidence from any source which may hereinafter be discovered and testimony  
24 pertaining thereto from any witness whose identities may hereafter be discovered.

25       These introductory comments apply to each and every response given herein,  
26 and are hereby incorporated by this reference as though fully set forth in each and  
27 every one of the following responses.  
28

**PLAINTIFF'S RESPONSES**

**REQUEST NO. 1:**

All documents evidencing income received by decedent Mark Ledford from January 1, 1995 up to and including the date of the incident, including but not limited to, paycheck stubs, W-2 forms, state and federal tax returns, and any other documentation demonstrating income generated by the decedent.

**RESPONSE TO REQUEST NO. 1:**

Plaintiff objects to this request and refuses to respond on grounds that said request seeks information protected from disclosure by the tax return privilege. *See Premium Service Corp. v. Sperry & Hutchinson Co.* (9th Cir. 1975) 511 F2d 225, 229; *Gattegno v. Price- Waterhousecoopers, LLP* (D CT 2001) 205 FRD 70, 73; *Trudeau v. New York State Consumer Protection Board* (ND NY 2006) 237 FRD 325, 331-332. Said request is further is vague, ambiguous and overbroad in time and scope and seeks information protected from disclosure by the right to financial privacy and the financial privacy rights of third parties. Plaintiff further objects to the extent said request seeks information subject to the attorney client and work product privileges and on grounds that said request calls for expert opinion, is premature because discovery has just begun, is not likely to lead to the discovery of admissible evidence.

Without waiving and subject to the general and foregoing objections, plaintiff responds as follows: Non-privileged documents evidencing income received by decedent can be found at:

<http://shopping.yahoo.com/p:mark%20ledford:1927078880:page=discography>

Discovery continues.

**REQUEST NO. 2:**

Documents evidencing income generated by plaintiff Althea Ledford from January 1, 1995 up to and including the date of the response to this request for

1 production, including, but not limited to, paycheck stubs, W-2 forms, and state and  
2 federal tax returns.

3 **RESPONSE TO REQUEST NO.2:**

4 Plaintiff objects to this request and refuses to respond on grounds that said  
5 request seeks information protected from disclosure by the tax return privilege. *See*  
6 *Premium Service Corp. v. Sperry & Hutchinson Co.* (9th Cir. 1975) 511 F2d 225,  
7 229; *Gattegno v. Price- Waterhousecoopers, LLP* (D CT 2001) 205 FRD 70, 73;  
8 *Trudeau v. New York State Consumer Protection Board* (ND NY 2006) 237 FRD  
9 325, 331–332. Said request is further is vague, ambiguous and overbroad in time  
10 and scope and seeks information protected from disclosure by the right to financial  
11 privacy and the financial privacy rights of third parties. Plaintiff further objects to  
12 the extent said request seeks information subject to the attorney client and work  
13 product privileges and on grounds that said request calls for expert opinion, is  
14 premature because discovery has just begun, is not likely to lead to the discovery of  
15 admissible evidence.

16 **REQUEST NO. 3:**

17 Documents evidencing medical treatment received by plaintiff Althea  
18 Ledford from January 1, 1995 up to and including the date of the response to this  
19 request for production.

20 **RESPONSE TO REQUEST NO.3:**

21 Plaintiff objects to this request on grounds that said request is vague,  
22 ambiguous and overbroad in time and scope and seeks information protected by the  
23 right to medical privacy and the privacy rights of third parties. In that regard,  
24 Plaintiff refuses to produce any documents relating to medical treatment sought by  
25 her for any reason from January 1, 1995 to present. Plaintiff further objects to the  
26 extent said request seeks information subject to the attorney client and work  
27 product privileges and on grounds that said request calls for expert opinion, is  
28

1 premature because discovery has just begun, is not likely to lead to the discovery of  
2 admissible evidence.

3 Without waiving and subject to the general and foregoing objections,  
4 plaintiff interprets and responds to this request as seeking documents evidencing  
5 medical treatment for Althea Ledford for injuries sustained and caused by the  
6 incidents alleged in the First Amended Complaint:

7 After a diligent search, Plaintiff is unable to locate any documents  
8 responsive to this request, since to Plaintiff's knowledge no responsive documents  
9 exist in her care, custody or control. Discovery continues.

10 **REQUEST NO. 4:**

11 Any and all documents which support the existence of any alleged emotional  
12 injuries suffered by plaintiff Althea Ledford as a result of the incident.

13 **RESPONSE TO REQUEST NO.4:**

14 Plaintiff objects to this request on grounds that said request is vague,  
15 ambiguous and overbroad in time and scope and seeks information protected by the  
16 right to medical privacy and the privacy rights of third parties. Plaintiff further  
17 objects to the extent said request seeks information subject to the attorney client  
18 and work product privileges and on grounds that said request calls for expert  
19 opinion, is premature because discovery has just begun, is not likely to lead to the  
20 discovery of admissible evidence.

21 Without waiving and subject to the general and foregoing objections,  
22 plaintiff responds as follows:

23 After a diligent search, Plaintiff attaches all documents in her care, custody  
24 and control responsive to this request identified by Bates Nos. P001-P0026,  
25 P00125-P00126; P00127-P00128; discovery continues. On information and belief,  
26 additional documents responsive to this request may be in the care, custody and  
27 control of this requesting party; Los Angeles County Coroner, located at 1104 N.  
28



1 Mission Rd., Los Angeles, CA (323) 343-0152; Daniel Freeman Memorial  
2 Hospital, located at 333 N. Prairie Ave., Inglewood, CA (310) 674-7050; and, LA  
3 County, Sq. #172 paramedics, address and phone number unknown at this time.  
4 Discovery continues.

5 **REQUEST NO. 5:**

6 Any and all documents which demonstrate the amount and nature of each  
7 expense allegedly incurred by plaintiff Althea Ledford as a result of the incident.

8 **RESPONSE TO REQUEST NO.5:**

9 Plaintiff objects to this request on grounds that said request is vague,  
10 ambiguous and overbroad in time and scope and seeks information protected by the  
11 right to medical privacy and the privacy rights of third parties. Plaintiff further  
12 objects to the extent said request seeks information subject to the attorney client  
13 and work product privileges and on grounds that said request calls for expert  
14 opinion, is premature because discovery has just begun, is not likely to lead to the  
15 discovery of admissible evidence. Said request seeks information in the care-  
16 custody and control of this requesting party and is therefore burdensome and meant  
17 to harass.

18 Without waiving and subject to the general and foregoing objections,  
19 plaintiff responds as follows:

20 After a diligent search, Plaintiff attaches all documents in her care, custody  
21 and control responsive to this request identified by Bates Nos. P001-P0026,  
22 P00125-P00126; P00127-P00128; discovery continues. On information and belief,  
23 additional documents responsive to this request may be in the care, custody and  
24 control of this requesting party; Los Angeles County Coroner, located at 1104 N.  
25 Mission Rd., Los Angeles, CA (323) 343-0152; Daniel Freeman Memorial  
26 Hospital, located at 333 N. Prairie Ave., Inglewood, CA (310) 674-7050; and, LA  
27 County, Sq. #172 paramedics, address and phone number unknown at this time.  
28

1 Discovery continues.

2 **REQUEST NO. 6:**

3 Any and all documents which reflect any written otherwise recorded  
4 statement of any witness to the incident.

5 **RESPONSE TO REQUEST NO.6:**

6 Plaintiff objects to this request on grounds that said request is vague,  
7 ambiguous with respect to the term "incident" and is overbroad in time and scope  
8 and seeks information protected from disclosure by the attorney-client and work  
9 product privileges. Plaintiff further objects to the extent said request seeks  
10 information subject to the attorney client and work product privileges and on  
11 grounds that said request seeks information already in the possession of this  
12 requesting party and is therefore burdensome and meant to harass.

13 Without waiving and subject to the general and foregoing objections,  
14 plaintiff responds as follows:

15 After a diligent search, Plaintiff attaches all documents in her care, custody  
16 or control responsive to this request identified by Bates Nos. P001-P0024; P00125-  
17 P00126; discovery continues. On information and belief, additional documents  
18 responsive to this request may be in the possession of this requesting party and the  
19 Los Angeles County Coroner, located at 1104 N. Mission Rd., Los Angeles, CA  
20 (323) 343-0152; Daniel Freeman Memorial Hospital, located at 333 N. Prairie  
21 Ave., Inglewood, CA (310) 674-7050; and, LA County, Sq. #172 paramedics,  
22 address and phone number unknown at this time. Discovery continues.

23 **REQUEST NO. 7:**

24 Any and all documents which identify all health care practitioners with  
25 whom decedent Mark Ledford consulted within the ten (10) years prior to the date  
26 of the incident, including but not limited to, medical doctors, chiropractors,  
27 physical therapists, psychiatrists and psychologists.  
28

1 **RESPONSE TO REQUEST NO.7:**

2 Plaintiff objects to this request on grounds that said request is vague,  
3 ambiguous and overbroad in time and scope and seeks information protected by the  
4 right to medical privacy and the privacy rights of third parties. Plaintiff further  
5 objects to the extent said request seeks information subject to the attorney client  
6 and work product privileges and on grounds that said request is premature because  
7 discovery has just begun, is not likely to lead to the discovery of admissible  
8 evidence.

9 Without waiving and subject to the general and foregoing objections,  
10 plaintiff responds as follows:

11 After a diligent search, Plaintiff attaches all documents in her care, custody  
12 and control responsive to this request identified by Bates Nos. P0028-P00124.  
13 Discovery continues.

14 **REQUEST NO. 8:**

15 Any and all documents which identify all medical institutions with whom  
16 decedent Mark Ledford consulted as an in-patient or out-patient in the ten (10)  
17 years preceding the date of the incident, including but not limited to, hospitals,  
18 emergency rooms, clinics, convalescent hospitals, rehabilitation facilities, or  
19 hospices.

20 **RESPONSE TO REQUEST NO.8:**

21 Plaintiff objects to this request on grounds that said request is vague,  
22 ambiguous and overbroad in time and scope and seeks information protected by the  
23 right to medical privacy and the privacy rights of third parties. Plaintiff further  
24 objects to the extent said request seeks information subject to the attorney client  
25 and work product privileges and on grounds that said request, is premature because  
26 discovery has just begun, is not likely to lead to the discovery of admissible  
27 evidence.  
28

1 Without waiving and subject to the general and foregoing objections,  
2 plaintiff responds as follows:

3 After a diligent search, Plaintiff attaches all documents in her care, custody  
4 and control responsive to this request identified by Bates Nos. P0028-P00124.  
5 Discovery continues.

6 **REQUEST NO. 9:**

7 Any and all documents which reflect the date, arresting agency and  
8 offense(s) charged for each and every occasion on which defendant Mark Ledford  
9 was arrested with the ten (10) years preceding the date of the incident.

10 **RESPONSE TO REQUEST NO.9:**

11 Plaintiff objects to this request and refuses to respond on grounds that said  
12 request seeks information protected by the right to privacy. *See* U.S. Constit.  
13 Amends. IV, V, IX, XIII; *see also* *Sheetz v. Morning Call, Inc.* (E.D. Penn. 1990)  
14 747 F.Supp. 1515, 1521. Said request is further vague, ambiguous and overbroad  
15 in time and scope. Plaintiff further objects to the extent said request seeks  
16 information subject to the attorney client and work product privileges and on  
17 grounds that said request is not likely to lead to the discovery of admissible  
18 evidence. Fed. Rules of Evid. 404(b). Said request is further burdensome and  
19 meant to harass, since documents responsive to this request is already in the  
20 possession of this requesting party.

21 **REQUEST NO. 10:**

22 Any and all medical records for decedent Mark Ledford for the ten (10) years  
23 preceding the date of the incident.

24 **RESPONSE TO REQUEST NO.10:**

25 Plaintiff objects to this request on grounds that said request is vague,  
26 ambiguous and overbroad in time and scope and seeks information protected by the  
27 right to medical privacy and the privacy rights of third parties. Plaintiff further  
28

1 objects to the extent said request seeks information subject to the attorney client  
2 and work product privileges and on grounds that said request calls for expert  
3 opinion, is premature because discovery has just begun, is not likely to lead to the  
4 discovery of admissible evidence.

5 Without waiving and subject to the general and foregoing objections,  
6 plaintiff responds as follows:

7 After a diligent search, Plaintiff attaches all documents in her care, custody  
8 and control responsive to this request identified by Bates Nos. P0028-P00124.  
9 Discovery continues.

10 **REQUEST NO. 11:**

11 County of Los Angeles death certificate for Mark Ledford.

12 **RESPONSE TO REQUEST NO.11:**

13 Plaintiff objects to this request on grounds that said request is vague,  
14 ambiguous and overbroad in time and scope and seeks information protected by the  
15 right to privacy and the privacy rights of third parties. Plaintiff further objects to  
16 the extent said request seeks information subject to the attorney client and work  
17 product privileges and on grounds that said request calls for expert opinion, is  
18 premature because discovery has just begun, is not likely to lead to the discovery of  
19 admissible evidence. Said request is further burdensome and meant to harass, since  
20 such documents responsive to this request is already in the possession of this  
21 requesting party and is on file with the Court as an attachment to "Declaration of  
22 Althea Ledford re Commencement of Action by Successor in Interest" filed and  
23 scanned October 26, 2006.

24 Without waiving and subject to the general and foregoing objections,  
25 plaintiff responds as follows:

26 After a diligent search, Plaintiff attaches all documents in her care, custody  
27 and control responsive to this request identified by Bates Nos. P0026-P0027.  
28



1 Discovery continues.

2 **REQUEST NO. 12:**

3 Los Angeles County Coroner Investigator's Case Assignment form dated  
4 November 1, 2004, identified in plaintiff's Rule 26 disclosures.

5 **RESPONSE TO REQUEST NO.12:**

6 Plaintiff objects to this request on grounds that said request is vague,  
7 ambiguous and overbroad in time and scope and seeks information protected by the  
8 right to privacy and the privacy rights of third parties. Plaintiff further objects to  
9 the extent said request seeks information subject to the attorney client and work  
10 product privileges and on grounds that said request calls for expert opinion, is  
11 premature because discovery has just begun, is not likely to lead to the discovery of  
12 admissible evidence. Said request is further burdensome and meant to harass, since  
13 such documents responsive to this request is already in the possession of this  
14 requesting party.

15 Without waiving and subject to the general and foregoing objections,  
16 plaintiff responds as follows:

17 After a diligent search, Plaintiff attaches all documents in her care, custody  
18 and control responsive to this request identified by Bates Nos. P0015-P0016.

19 **REQUEST NO. 13:**

20 Los Angeles County Coroner Hospital and Nursing Care Facility Report.

21 **RESPONSE TO REQUEST NO.13:**

22 Plaintiff objects to this request on grounds that said request is vague,  
23 ambiguous and overbroad in time and scope and seeks information protected by the  
24 right to privacy and the privacy rights of third parties. Plaintiff further objects to  
25 the extent said request seeks information subject to the attorney client and work  
26 product privileges and on grounds that said request calls for expert opinion, is  
27 premature because discovery has just begun, is not likely to lead to the discovery of  
28



#410  
admissible evidence. Said request is further burdensome and meant to harass, since  
1 such documents responsive to this request is already in the possession of this  
2 requesting party.

3 Without waiving and subject to the general and foregoing objections,  
4 plaintiff responds as follows:

5 After a diligent search, Plaintiff attaches all documents in her care, custody  
6 and control responsive to this request identified by Bates No. P0022.

7 **REQUEST NO. 14:**

8 Business card from Detective Kevin Lane identified in plaintiff's Rule 26  
9 disclosures.

10 **RESPONSE TO REQUEST NO.14:**

11 Plaintiff objects to this request on grounds that said request is vague, ambiguous  
12 and overbroad in time and scope and seeks information protected by the right to  
13 privacy and the privacy rights of third parties. Plaintiff further objects to the extent  
14 said request seeks information subject to the attorney client and work product  
15 privileges and on grounds that said request calls for expert opinion, is premature  
16 because discovery has just begun, is not likely to lead to the discovery of  
17 admissible evidence. Said request is further burdensome and meant to harass, since  
18 such documents responsive to this request is already in the possession of this  
19 requesting party.

20 Without waiving and subject to the general and foregoing objections,  
21 plaintiff responds as follows:

22 After a diligent search, Plaintiff attaches all documents in her care, custody  
23 and control responsive to this request identified by Bates Nos. P0023-P0024.  
24 Discovery continues.

25 **REQUEST NO. 15:**

26 Althea Ledford's T-Mobile call detail on 10/31/04 at 11:22p.m. to 911  
27 emergency; 10/31/04 call to Information to obtain phone number for Inglewood  
28

Police Department at 11:22 p.m., 10/31/04 call to Inglewood Police Department at 11:24 p.m. identified in plaintiff's Rule 26 disclosures.

**RESPONSE TO REQUEST NO.15:**

Plaintiff objects to this request on grounds that said request is vague, ambiguous and overbroad in time and scope and seeks information protected by the right to privacy and the privacy rights of third parties. *See* Cal. Public Util. 2891; *see also* 18 U.S.C. 2511; U.S. Constit. Amend. IV. Plaintiff further objects to the extent said request seeks information subject to the attorney client and work product privileges and on grounds that said request calls for expert opinion, is premature because discovery has just begun, is not likely to lead to the discovery of admissible evidence.

Without waiving and subject to the general and foregoing objections, plaintiff responds as follows:

After a diligent search, Plaintiff attaches all documents in her care, custody and control responsive to this request identified by Bates Nos. P00125-P00126. Discovery continues.

Dated: May 23, 2007

SCHONBRUN DESIMONE SELOW  
HARRIS & HOFFMAN LLP

Wilmer J. Harris, Esq.  
Peggy Roman-Jacobson, Esq., Attorneys for  
Plaintiff ALTHEA LEDFORD

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am a resident of the aforesaid county, State of California; I am over the age of 18 years and not a party to the within action; my business address is 414 S. Marengo, Pasadena, California 91101.

On May 23, 2007 I caused the service of the following document described as:

PLAINTIFF'S RESPONSES TO DEFENDANT'S NOTICE TO PRODUCE  
DOCUMENTS, SET ONE

on all interested parties in this action by placing \_\_\_ an original or X a true copy thereof enclosed in sealed envelope addressed as follows:

Taufiki D. Joshua, Esq.  
Assistant City Attorney  
Inglewood City Attorney's Office  
One Manchester Blvd. Ste. 860  
P.O. Box 6500  
Inglewood, CA 90312

Michael D. Allen  
Franscell, Strickland, Roberts &  
Lawrence, P.C.  
100 West Broadway  
Suite 1200  
Glendale, CA 91210

— [By Facsimile] The facsimile machine I used complied with California Rules of Court, Rule 2006(d). I caused the machine to print a record of the transmission, a copy of which is attached to this declaration. I served the foregoing on the interested parties by use of a facsimile machine, telephone number (626) 449.4417, transmitting a true and correct copy to the following:

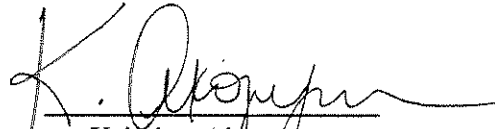
— [By personal service] I caused the above stated document to be delivered to the individuals listed above.

X [By MAIL] I caused such envelope to be deposited in the mail at Pasadena, California. The envelope was mailed with postage thereof fully prepaid.

Executed on May 23, 2007 at Pasadena, California.

— [State] I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

X [FEDERAL] I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

  
Kristina Akopyan

**FRANSCCELL, STRICKLAND, ROBERTS & LAWRENCE**

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AARON M. FONTANA  
\* Also admitted Arizona  
† Also admitted District of Columbia

June 15, 2007

Peggy Roman-Jacobson, Esq.  
Schonbrun, DeSimone, Seplow, Harris & Hoffman  
414 South Marengo Avenue  
Pasadena, CA 91101

Re: Althea Ledford v. City of Inglewood, et al.  
USDC, Case No. CV 06-06796 CAS (PLAx)

Dear Ms. Roman-Jacobson:

This letter is pursuant to Local Rule 37-1 in a good faith attempt to informally resolve issues pertaining to Plaintiff's response to Defendant's Notice to Produce Documents Set One and Defendant's Interrogatories Set One. Please meet with me at this office on June 25, 2007, at 2:00 p.m. to discuss the following issues.

**Discovery Regarding Financial Background:**

Interrogatory No. 2 and Request for Production of Documents Nos. 1 and 2 seek information regarding decedent Mark Ledford's financial background including his employment history and tax returns. This is obviously relevant to Plaintiff's damages claims. First, it is unclear if the recorded work of Mark Ledford found at the URL given by Plaintiff is the complete employment record requested. Also, Plaintiff's responses fail to provide the employer contact information.

Also, Plaintiff's Rule 26 disclosures clearly indicate that the scope of damages sought includes loss of earnings and loss of earnings capacity. Unless Plaintiff is willing to waive such damages claims, the discovery seeking various tax returns is discoverable. See Fed.R.Civ.P., Rule 26(a)(1)(C) (duty to disclose documents supporting computation of damages); *Gattegno v. Pricewaterhousecoopers, LLP*, 205 F.R.D. 70, 73 (D.C.N. 2001) (plaintiff's tax returns are discoverable if they are relevant to the action and the information contained therein is not otherwise readily obtainable). *Cooper v. Hallgarten & Co.*, 34 F.R.D. 482, 484 (S.D.N.Y. 1964) (same); see also *U.S. v. Bonanno Organized Crime Family of La Cosa*, 119 F.R.D. 625, 627-28 (E.D.N.Y. 1988); *S.E.C. v. Cynoticolor Corp.*, 106 F.R.D. 545, 547 (D.C.N.Y. 1985); and

Peggy Roman-Jacobson, Esq.  
Re: Althea Ledford v. City of Inglewood, et., al.  
June 15, 2007  
Page 2

*Trudeau v. New York State Consumer Protection Board*, 237 F.R.D. 325, 331 (U.S. Dist. Ct. 2006).

**Discovery Regarding Arrest History:**

Interrogatory No. 3 and Request for Production No. 9 seek information pertaining to Ledford's arrest history. Prior arrests are relevant, among other things, to show potential bias against law enforcement and a motive in bringing suit. *Heath v. Cast*, 813 F.2d 254, 259 (9th Cir. 1987).

**Discovery Regarding Medical History:**

Interrogatories No. 8-10 and Request for Production of Documents Nos. 3-5, 7-8 and 10 seek medical history relevant to the instant lawsuit. As to decedent Mark Ledford, Defendant is entitled to discover Ledford's relevant medical background to ascertain contributing factors to his death. Similarly, since the Rule 26 disclosures clearly indicate that Plaintiff is seeking damages for "severe emotion distress and mental injuries," her medical background is also relevant. A party cannot claim medical privacy when such evidence is at issue. *See Gill v. Gilder*, 1997 WL 419983, at 3 (S.D.N.Y., 1997); *Doe v. Marsh*, 918 F. Supp. 580, 585 (N.D.N.Y. 1996); *And See, Ferrell v. Glen-Gery Brick*, 678 F.Supp. 111, 112 (E.D.Pa. 1987).

**Discovery Regarding Plaintiff's T-Mobil Call Detail:**

Request No. 15 seeks "Althea Ledford's T-Mobil call detail on 10/31/04 at 11:22 p.m. to 911 emergency; 10/31/04 call to Information to obtain phone number for Inglewood Police Department at 11:22 p.m.; 10/31/04 call to Inglewood Police Department at 11:24 p.m., identified in plaintiff's Rule 26 disclosures." Plaintiff's objections are unfounded. The requested information will be crucial in establishing facts leading up to the death of the decedent. *Burlington Northern & Santa Fe Ry. Corp. v. United States Dist. Court for the Dist. of Montana*, 408 F.3d 1142, 1148-1149 (9th Cir. 2005) (holding the purpose of discovery is to find relevant information). Plaintiff thus must provide the requested information.

Our proposed resolution with respect to the foregoing issues is that Plaintiff agrees to provide full and complete supplemental responses within the next thirty (30) days addressing the foregoing issues.

If we are not able to informally resolve the foregoing issues, we will be left with no choice but to file a motion to compel further responses. Of course, Defendant reserves the right to seek recovery of any additional attorney's fees incurred in having to bring such a motion.

Peggy Roman-Jacobson, Esq.  
Re: Althea Ledford v. City of Inglewood, et., al.  
June 15, 2007  
Page 3

I look forward to meeting with you on June 25, 2007. If you are not available to meet with me at that date and time, please contact me when you receive this letter so that we can arrange to meet on another date and time keeping in mind that Local Rule 37 requires the meeting take place within ten (10) days of the date of this letter.

Very truly yours,

FRANSCCELL, STRICKLAND,  
ROBERTS & LAWRENCE, PC



Aaron M. Fontana



SCHONBRUN DESIMONE SEPLOW  
HARRIS & HOFFMAN LLP

Benjamin Schonbrun  
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Of Counsel  
Erwin Chemerinsky  
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Adrienne J. Quarry

Venice Office  
723 Ocean Front Walk  
Venice, California 90291  
(310) 396-0731  
(310) 399-7040 (fax)

September 17, 2007

VIA FAX AND FIRST CLASS MAIL

Michael D. Allen  
FRANSCCELL, STRICKLAND, ROBERTS & LAWRENCE, P.C.  
A Professional Corporation  
100 West Broadway, Suite 1200  
Glendale, California 91210-1219

Re: *Althea Ledford v. City of Inglewood, et.al.*  
Defendants' Joint Stipulation/Rule 37-1 Meet and Confer

Dear Mr. Allen:

Thank you for granting our office a one week extension to respond to Defendants' Joint Stipulation. In that regard, I am back in the office on a limited basis and will be in a position address your response to the foregoing.

Notwithstanding the above, we disagree that Defendants engaged in an appropriate Rule 37-1 meet and confer with respect to this motion. Your reliance on our after-court discussion and follow-up letter regarding Defendants' production request and interrogatories several months ago does not fulfill the requirements of Rule 37-1. Specifically, the parties agreed that Plaintiff would supplement her responses to discovery to specifically identify Mr. Ledford's sources of income. Based thereon, you agreed not to pursue the motion. On August 10, 2007, I served supplemental responses to Defendants' Interrogatories, Set One and Notice to Produce, Set One. Plaintiff's supplemental responses to document requests included numerous wage documents. Thereafter, you failed to serve any request for an in-person meet and confer as required by L.R. 37-1 and simply served your motion. The points and authorities contained in your motion were never conveyed to me or my firm in any manner before service.

However, in light of our respective professionalism in this matter and in lieu of proceeding with the motion, we offer the following compromise:

Michael D. Allen  
FRANSCCELL, STRICKLAND, ROBERTS & LAWRENCE, P.C.  
September 17, 2007  
Page 2

First, as I stated to you verbally, Plaintiff is in the process of obtaining Mr. Ledford's wage documents via release and subpoena from the following entities identified in Plaintiff's supplemental responses to Defendants' Interrogatories, Set One:

1. Sean Dole, Performer Services Administrator, PPL VPL, 1 Upper James Street, London, W1F 9DE, Telephone: +44(0)2075341158, Fax: +44(0)2075341111, Email: [sean.dole@ppluk.com](mailto:sean.dole@ppluk.com), Website: [www.ppluk.com/www.vpluk.com](http://www.ppluk.com/www.vpluk.com), Royalty Account No. 0101456697;
2. SESAC, 55 Music Square East, Nashville, TN 37203, Affil. No. 104855
3. AFTRA (American Federation of Recording Artists) Health & Retirement Funds, 261 Madison Ave., NY, NY 10016-2495, (800) 562-4690; (212) 499-4800; Fax: (212) 499-4925; [www.aftrahr.com](http://www.aftrahr.com), AFTRA No. 158386.
4. American Federation of Musicians, 1501 Broadway, Ste. 600, New York, NY 10036, Ph: (212) 869-1330; Fax: (212) 764-6134; [www.afm.org](http://www.afm.org); Acct. No. 55613
5. Alan ETT Music Group, 12711 Ventura Blvd., Ste. 110, Studio City, CA 91604, (818) 508-3303; Fax: (818) 508-3314.
6. Pat Metheny Group

Once we obtain these documents we will provide them to you without further request. Based upon the information available to us, we believe the above six entities will reflect the substantial earnings of Mr. Ledford from his various performances and recordings. Due to the nature of Mr. Ledford's employment, we will not be able to obtain wage documents from all of the various performances, recordings or production work. In that regard, we will agree to limit our lost earnings evidence at trial to documents that defendants have in their possession. You are of course welcome to subpoena this information directly since six subpoenas should not present a hardship, financial or otherwise to your clients. Had you requested a Rule 37-1 meeting regarding Plaintiff's supplemental responses we would have apprised you of the above offer without the necessity of the motion.

Please confirm your agreement to refrain from proceeding with Defendants' Joint Stipulation by close of business tomorrow or we will oppose your motion and reluctantly request monetary sanctions for failure to comply with L.R. 37-1 and for filing a frivolous motion in light of our recent advisement.

Very truly yours,

  
SCHONBRUN DESIMONE SEBLOW HARRIS & HOFFMAN, LLP

Peggy Roman-Jacobson, Esq.

PRJ/ka

cc: Taufiki Joshua (via fax)

A088 (REV. 1/94) Subpoena in a Civil Case

Issued by the  
UNITED STATES DISTRICT COURT

CENTRAL

DISTRICT OF

CALIFORNIA

ALTHEA LEDFORD, individually, and as the successor in  
interest of MARK LEDFORD, deceased

v.

SUBPOENA IN A CIVIL CASE

CASE NUMBER: 06-06796 ODW (PLAx)

CITY OF INGLEWOOD, ET AL

TO: ALAN ETT MUSIC GROUP  
12711 VENUTRA BLVD. #110, STUDIO CITY, CA

☐ YOU ARE COMMANDED to appear in the United States District Court at the place, date, and time specified below to  
testify in the above case.

|                    |               |
|--------------------|---------------|
| PLACE OF TESTIMONY | COURTROOM     |
|                    | DATE AND TIME |

☐ YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in  
the above case.

|                     |               |
|---------------------|---------------|
| PLACE OF DEPOSITION | DATE AND TIME |
|---------------------|---------------|

☒ YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the  
place, date, and time specified below (list documents or objects):

Any and all records regarding earnings by MARK AARON LEDFORD, including but not limited to, wages, advances,  
advances against royalties, royalties, bonuses, salaries, and other related payouts, as well as expenses.

|   |                 |
|---|-----------------|
| PLACE   | DATE AND TIME   |
| COPY MASTER ATTORNEY DOCUMENT SERVICE<br>13337 SOUTH STREET #39, CERRITOS, CA 90703 | 12/5/07 8:00 AM |

☐ YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

|          |               |
|----------|---------------|
| PREMISES | DATE AND TIME |
|----------|---------------|

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more  
officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth for each  
person designated, the matters on which the person will testify, Federal Rules of Civil Procedure, 30 (b) (6).

ISSUING OFFICER'S SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)

DATE



ATTORNEY FOR DEFENDANT

11/15/2007

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER

MICHAEL D. ALLEN, ESQ. FRANSCELL, STRICKLAND, ROBERTS & LAWRENCE, PC  
100 W. BROADWAY, SUITE 1200, GLENDALE, CA 91210-1219 818-545-1925

(See Rule 45, Federal Rules Civil Procedure, Parts C & D on Reverse)

1 If action is pending in district other than district of issuance, state district under case number.

EXHIBIT "F"

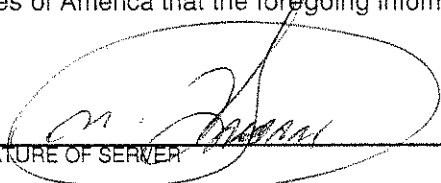
PROOF OF SERVICE

|                        | DATE           | PLACE  |
|------------------------|----------------|--|
| SERVED                 | 11/20/07       | 12711 VENTURA Blvd. #110<br>STUDIO CITY, CA. |
| SERVED ON (PRINT NAME) | Nikki Angel    | MANNER OF SERVICE<br>IN PERSON               |
| SERVED BY (PRINT NAME) | Mehran Jabbari | TITLE<br>Prof. Copier                        |

DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.

Executed on 11/20/07  
DATE

  
SIGNATURE OF SERVER  
P.O. BOX 40167  
ADDRESS OF SERVER  
Downey, CA.

Rule 45, Federal Rules of Civil Procedure, Parts C & D:

(c) PROTECTION OF PERSONS SUBJECT TO SUBPOENAS.

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction which may include, but is not limited to, lost earnings and reasonable attorney's fee.

(2) (A) A person commanded to produce and permit inspection

**COPY MASTER ATTORNEY DOCUMENT SERVICE**

P. O. BOX 40167  
DOWNEY, CA. 90239

TELEPHONE #: 714-484-7561  
FAX #: 714-484-6741

**CERTIFICATE OF CUSTODIAN OF RECORDS**  
**California Evid. Code 1561 and Bus. and Prof. Code 22462**

NAME: MARK AARON LEDFORD

Also Known As (AKA): \_\_\_\_\_

BIRTHDATE: 3/16/80

C.M. FILE #: 41972-5

I am a duly authorized custodian of records, or other qualified witness for:

**ALAN ETT MUSIC GROUP**

**12711 VENUTRA BLVD. #110,**  
**STUDIO CITY, CA 91604**

As such, I have the authority to certify these records.

☐ **CERTIFICATION OF RECORDS**

1. To the best of my knowledge, all such records were prepared or compiled by personnel of the above-named business in the ordinary course of business, at or near the time of the acts, conditions, or events recorded.
2. No documents have been withheld in order to avoid their being photocopied.
3. We have only part of the records. We do not have: \_\_\_\_\_

☒ **CERTIFICATE OF NO RECORDS**

1. A thorough search has been made for the documents described in the Authorization, and based on the information provided to us for identification, no such records were found.
2. No copies or records are transmitted because we do not have said records.

☐ **CERTIFICATE OF LOST RECORD**

We do have records on above patient / employee / subject in this Authorization, but at present time we cannot locate such records, it is believed that these records have been lost

☐ **CERTIFICATE OF PATIENT REFUSAL TO RELEASE RECORDS**

☐ **CERTIFICATE OF DESTROYED RECORDS**

The above needed records have been destroyed on or about, \_\_\_\_\_

☐ **I HAVE NO BILLING RECORDS.**

☐ **I HAVE NO X-RAYS.**

☐ **I HAVE NO SIGN IN SHEETS**

I declare under penalty of perjury that the foregoing is true and correct.

Date: 11/28/07

☐ At above address

☒ Records were mailed

Print Name: X Katie Johnson

Signature: X [Signature]

Witness: \_\_\_\_\_

Title: Operations

**AFFIDAVIT OF PROFESSIONAL PHOTOCOPIER**  
(bus. and prof. code sec. 22462(a)(2))

I declare that the records received from Custodian of Records signing this document were transmitted or distributed to the distributed distributed to the persons or entities entitled thereto pursuant to the Authorization requiring the production of these records.

Date: \_\_\_\_\_

Signature: \_\_\_\_\_

**AFFIDAVIT OF CUSTODIAN OF RECORDS**

**COPY MASTER**  
ATTORNEY DOCUMENT SERVICE

4841

~~Work Order~~ Copy

Date: 11/15/2007

Amount: \$ 15.00

Pay to the order of: ALAN ETT MUSIC GROUP

Re: MARK AARON LEDFORD

CM#: 41972-5

Signature \_\_\_\_\_ Telephone \_\_\_\_\_



#422

# **COPY MASTER**

ATTORNEY DOCUMENT SERVICE  
P.O. BOX 40167  
DOWNEY, CA 90239  
TEL: 714-484-7564  
FAX: 714-484-6743

MICHAEL ALLEN, ESQ.  
FRANSCCELL, STRICKLAND, ROBERTS & LAWRENCE, PC  
100 W. BROADWAY, SUITE 1200  
GLENDALE CA 91210-1219

File# 240-3  
RE: MARK AARON LEDFORD

Date November 27, 2007

In Ref. To C.M. #: 41972-6

Custodian:  
PAT METHENY GROUP

Dear Client :

There has been a delay in securing the records from the above custodian due to the following reason(s):

WITH THE INFORMATION THAT WAS PROVIDED BY YOUR OFFICE & AFTER USING ALL OUR RESOURCES, WE ARE STILL UNABLE TO LOCATE THIS FACILITY. THEREFORE WE HAVE BEEN UNABLE TO SERVE THE YOUR REQUEST. IF ANY ADDITIONAL INFORMATION IS LOCATED REGARDING THIS FACILITY PLEASE INFORM OUR OFFICE ASAP.

X This order will be closed in two weeks on 12/11/2007 if no response is received from your office. However, if any new information is obtained, we'll be happy to re-open & follow up on this order.

We will deliver your requested records as soon as they become available. If you are no longer in need of these records or would like to cancel this location, please call our office asap.

Very truly yours,

\_\_\_\_\_  
Customer service

COMMITMENT TO CUSTOMER SERVICE



JOHN BEITER

1906 Acklen Avenue  
Nashville, TN 37212

Main 615.749.8300  
Fax 615.676.5190  
jbeiter@loeb.com

Via E-mail (mallen@franscell.com) and  
Certified Mail; Return Receipt Requested

December 6, 2007

Michael D. Allen, Esq.  
Franscell, Strickland, Roberts & Lawrence  
100 West Broadway, Suite 1200  
Glendale, CA 91210-1219

Re: Ledford v. City of Inglewood/Subpoena to SESAC, Inc.

Dear Mr. Allen:

Pursuant to the subpoena received by SESAC, Inc. in the above-referenced lawsuit, and subsequent telephone conversations, enclosed is a spreadsheet showing quarterly royalty payments made to Aaron Ledford and his d/b/a publishing designee, Ajaron Publishing, for public performances musical compositions, both domestic and foreign, for the periods stated. It is SESAC's understanding that this production will suffice for your purpose for the time being. Please feel free to contact me at your convenience if you would like to discuss this matter further.

Regards,

A handwritten signature in black ink, appearing to read "John Beiter", written over a horizontal line.

John Beiter

Enclosure

cc: Dennis Lord  
Teresa Pitt

| quarter                        | affiliate name      | song title       | share | earnings  | artist       |
|--------------------------------|---------------------|------------------|-------|-----------|--------------|
| 19982                          | Ajaron Publishing   | I WILL           | 50    | \$ 18.75  | MARK LEDFORD |
| 19983                          | Ajaron Publishing   | I WILL           | 50    | \$ 18.75  | MARK LEDFORD |
| 19984                          | Ajaron Publishing   | I WILL           | 50    | \$ 18.75  | MARK LEDFORD |
| 19991                          | Ajaron Publishing   | I WILL           | 50    | \$ 18.75  | MARK LEDFORD |
| 19982                          | Ajaron Publishing   | IM COMING OUT    | 50    | \$ 18.75  | MARK LEDFORD |
| 19983                          | Ajaron Publishing   | IM COMING OUT    | 50    | \$ 18.75  | MARK LEDFORD |
| 19984                          | Ajaron Publishing   | IM COMING OUT    | 50    | \$ 18.75  | MARK LEDFORD |
| 19991                          | Ajaron Publishing   | IM COMING OUT    | 50    | \$ 18.75  | MARK LEDFORD |
| 19982                          | Ajaron Publishing   | TOUCHA U         | 50    | \$ 18.75  | MARK LEDFORD |
| 19983                          | Ajaron Publishing   | TOUCHA U         | 50    | \$ 18.75  | MARK LEDFORD |
| 19984                          | Ajaron Publishing   | TOUCHA U         | 50    | \$ 18.75  | MARK LEDFORD |
| 19991                          | Ajaron Publishing   | TOUCHA U         | 50    | \$ 18.75  | MARK LEDFORD |
| 20071                          | Ajaron Publishing   | TOUCHA U         | 50    | \$ 2.74   | MARK LEDFORD |
| 19982                          | Ajaron Publishing   | U GOTTA BE CRAZY | 50    | \$ 18.75  | MARK LEDFORD |
| 19983                          | Ajaron Publishing   | U GOTTA BE CRAZY | 50    | \$ 18.75  | MARK LEDFORD |
| 19984                          | Ajaron Publishing   | U GOTTA BE CRAZY | 50    | \$ 18.75  | MARK LEDFORD |
| 19991                          | Ajaron Publishing   | U GOTTA BE CRAZY | 50    | \$ 18.75  | MARK LEDFORD |
| 20064                          | Ajaron Publishing   | U GOTTA BE CRAZY | 50    | \$ 2.48   | MARK LEDFORD |
| 19982                          | Ajaron Publishing   | WAY I FEEL       | 50    | \$ 18.75  | MARK LEDFORD |
| 19983                          | Ajaron Publishing   | WAY I FEEL       | 50    | \$ 18.75  | MARK LEDFORD |
| 19984                          | Ajaron Publishing   | WAY I FEEL       | 50    | \$ 18.75  | MARK LEDFORD |
| 19991                          | Ajaron Publishing   | WAY I FEEL       | 50    | \$ 18.75  | MARK LEDFORD |
| 20033                          | Ajaron Publishing   | WAY I FEEL       | 50    | \$ 1.96   |              |
| 20053                          | Ajaron Publishing   | WAY I FEEL       | 50    | \$ 2.09   | MARK LEDFORD |
| 20061                          | Ajaron Publishing   | WAY I FEEL       | 50    | \$ 2.58   | MARK LEDFORD |
| 20062                          | Ajaron Publishing   | WAY I FEEL       | 50    | \$ 2.08   | MARK LEDFORD |
| 20063                          | Ajaron Publishing   | WAY I FEEL       | 50    | \$ 2.65   | MARK LEDFORD |
| 20064                          | Ajaron Publishing   | WAY I FEEL       | 50    | \$ 5.22   | MARK LEDFORD |
| 20071                          | Ajaron Publishing   | WAY I FEEL       | 50    | \$ 2.26   | MARK LEDFORD |
| 20072                          | Ajaron Publishing   | WAY I FEEL       | 50    | \$ 2.23   | MARK LEDFORD |
| <b>Ajaron Publishing Total</b> |                     |                  |       | \$ 401.29 |              |
| 19982                          | Ledford, Mark Aaron | I WILL           | 25    | \$ 9.38   | MARK LEDFORD |
| 19983                          | Ledford, Mark Aaron | I WILL           | 25    | \$ 9.38   | MARK LEDFORD |
| 19984                          | Ledford, Mark Aaron | I WILL           | 25    | \$ 9.38   | MARK LEDFORD |
| 19991                          | Ledford, Mark Aaron | I WILL           | 25    | \$ 9.38   | MARK LEDFORD |
| 19982                          | Ledford, Mark Aaron | IM COMING OUT    | 50    | \$ 18.75  | MARK LEDFORD |
| 19983                          | Ledford, Mark Aaron | IM COMING OUT    | 50    | \$ 18.75  | MARK LEDFORD |
| 19984                          | Ledford, Mark Aaron | IM COMING OUT    | 50    | \$ 18.75  | MARK LEDFORD |
| 19991                          | Ledford, Mark Aaron | IM COMING OUT    | 50    | \$ 18.75  | MARK LEDFORD |
| 19982                          | Ledford, Mark Aaron | TOUCHA U         | 50    | \$ 18.75  | MARK LEDFORD |
| 19983                          | Ledford, Mark Aaron | TOUCHA U         | 50    | \$ 18.75  | MARK LEDFORD |
| 19984                          | Ledford, Mark Aaron | TOUCHA U         | 50    | \$ 18.75  | MARK LEDFORD |
| 19991                          | Ledford, Mark Aaron | TOUCHA U         | 50    | \$ 18.75  | MARK LEDFORD |
| 20071                          | Ledford, Mark Aaron | TOUCHA U         | 50    | \$ 2.74   | MARK LEDFORD |
| 19982                          | Ledford, Mark Aaron | U GOTTA BE CRAZY | 50    | \$ 18.75  | MARK LEDFORD |
| 19983                          | Ledford, Mark Aaron | U GOTTA BE CRAZY | 50    | \$ 18.75  | MARK LEDFORD |
| 19984                          | Ledford, Mark Aaron | U GOTTA BE CRAZY | 50    | \$ 18.75  | MARK LEDFORD |
| 19991                          | Ledford, Mark Aaron | U GOTTA BE CRAZY | 50    | \$ 18.75  | MARK LEDFORD |
| 20064                          | Ledford, Mark Aaron | U GOTTA BE CRAZY | 50    | \$ 2.48   | MARK LEDFORD |
| 19982                          | Ledford, Mark Aaron | WAY I FEEL       | 50    | \$ 18.75  | MARK LEDFORD |

|       |                                  |            |    |    |        |              |
|-------|----------------------------------|------------|----|----|--------|--------------|
| 19983 | Ledford, Mark Aaron              | WAY I FEEL | 50 | \$ | 18.75  | MARK LEDFORD |
| 19984 | Ledford, Mark Aaron              | WAY I FEEL | 50 | \$ | 18.75  | MARK LEDFORD |
| 19991 | Ledford, Mark Aaron              | WAY I FEEL | 50 | \$ | 18.75  | MARK LEDFORD |
| 20033 | Ledford, Mark Aaron              | WAY I FEEL | 50 | \$ | 1.96   |              |
| 20053 | Ledford, Mark Aaron              | WAY I FEEL | 50 | \$ | 2.09   | MARK LEDFORD |
| 20061 | Ledford, Mark Aaron              | WAY I FEEL | 50 | \$ | 2.58   | MARK LEDFORD |
| 20062 | Ledford, Mark Aaron              | WAY I FEEL | 50 | \$ | 2.08   | MARK LEDFORD |
| 20063 | Ledford, Mark Aaron              | WAY I FEEL | 50 | \$ | 2.65   | MARK LEDFORD |
| 20064 | Ledford, Mark Aaron              | WAY I FEEL | 50 | \$ | 5.22   | MARK LEDFORD |
| 20071 | Ledford, Mark Aaron              | WAY I FEEL | 50 | \$ | 2.26   | MARK LEDFORD |
| 20072 | Ledford, Mark Aaron              | WAY I FEEL | 50 | \$ | 2.23   | MARK LEDFORD |
|       | <b>Ledford, Mark Aaron Total</b> |            |    | \$ | 363.81 |              |
|       | <b>Grand Total</b>               |            |    | \$ | 765.10 |              |
|       |                                  |            |    |    |        | \$2,295.30   |

| quarter | affiliate name    | song title       | share | country        |
|---------|-------------------|------------------|-------|----------------|
| 19994   | AJARON PUBLISHING | WAY I FEEL       | 50    | JAPAN          |
| 19994   | AJARON PUBLISHING | WAY I FEEL       | 50    | JAPAN          |
| 20001   | AJARON PUBLISHING | U GOTTA BE CRAZY | 50    | JAPAN          |
| 20001   | AJARON PUBLISHING | WAY I FEEL       | 50    | JAPAN          |
| 20001   | AJARON PUBLISHING | WAY I FEEL       | 50    | JAPAN          |
| 20001   | AJARON PUBLISHING | WAY I FEEL       | 50    | JAPAN          |
| 20001   | AJARON PUBLISHING | WAY I FEEL       | 50    | JAPAN          |
| 20001   | AJARON PUBLISHING | WAY I FEEL       | 50    | JAPAN          |
| 20001   | AJARON PUBLISHING | WAY I FEEL       | 50    | NORWAY         |
| 20002   | AJARON PUBLISHING | U GOTTA BE CRAZY | 50    | SPAIN          |
| 20002   | AJARON PUBLISHING | U GOTTA BE CRAZY | 50    | SPAIN          |
| 20002   | AJARON PUBLISHING | U GOTTA BE CRAZY | 50    | SPAIN          |
| 20002   | AJARON PUBLISHING | U GOTTA BE CRAZY | 50    | SPAIN          |
| 20002   | AJARON PUBLISHING | U GOTTA BE CRAZY | 50    | SPAIN          |
| 20002   | AJARON PUBLISHING | U GOTTA BE CRAZY | 50    | SWITZERLAND    |
| 20002   | AJARON PUBLISHING | WAY I FEEL       | 50    | SWITZERLAND    |
| 20003   | AJARON PUBLISHING | WAY I FEEL       | 50    | NETHERLANDS    |
| 20003   | AJARON PUBLISHING | WAY I FEEL       | 50    | NETHERLANDS    |
| 20003   | AJARON PUBLISHING | WAY I FEEL       | 50    | NETHERLANDS    |
| 20003   | AJARON PUBLISHING | U GOTTA BE CRAZY | 50    | SWITZERLAND    |
| 20003   | AJARON PUBLISHING | WAY I FEEL       | 50    | SWITZERLAND    |
| 20004   | AJARON PUBLISHING | WAY I FEEL       | 50    | SWITZERLAND    |
| 20011   | AJARON PUBLISHING | WAY I FEEL       | 50    | NORWAY         |
| 20011   | AJARON PUBLISHING | WAY I FEEL       | 50    | SOUTH AFRICA   |
| 20011   | AJARON PUBLISHING | I WILL           | 50    | SPAIN          |
| 20011   | AJARON PUBLISHING | U GOTTA BE CRAZY | 50    | SPAIN          |
| 20011   | AJARON PUBLISHING | WAY I FEEL       | 50    | SPAIN          |
| 20011   | AJARON PUBLISHING | WAY I FEEL       | 50    | SPAIN          |
| 20011   | AJARON PUBLISHING | WAY I FEEL       | 50    | SPAIN          |
| 20011   | AJARON PUBLISHING | WAY I FEEL       | 50    | SWITZERLAND    |
| 20013   | AJARON PUBLISHING | WAY I FEEL       | 50    | CZECH REPUBLIC |
| 20013   | AJARON PUBLISHING | WAY I FEEL       | 50    | NETHERLANDS    |
| 20013   | AJARON PUBLISHING | WAY I FEEL       | 50    | NETHERLANDS    |
| 20013   | AJARON PUBLISHING | WAY I FEEL       | 50    | NETHERLANDS    |
| 20013   | AJARON PUBLISHING | WAY I FEEL       | 50    | SOUTH AFRICA   |
| 20013   | AJARON PUBLISHING | U GOTTA BE CRAZY | 50    | SPAIN          |
| 20013   | AJARON PUBLISHING | U GOTTA BE CRAZY | 50    | SPAIN          |
| 20013   | AJARON PUBLISHING | U GOTTA BE CRAZY | 50    | SPAIN          |
| 20013   | AJARON PUBLISHING | U GOTTA BE CRAZY | 50    | SPAIN          |
| 20013   | AJARON PUBLISHING | U GOTTA BE CRAZY | 50    | SPAIN          |
| 20013   | AJARON PUBLISHING | WAY I FEEL       | 50    | SPAIN          |
| 20013   | AJARON PUBLISHING | WAY I FEEL       | 50    | SWITZERLAND    |
| 20013   | AJARON PUBLISHING | WAY I FEEL       | 50    | SWITZERLAND    |
| 20021   | AJARON PUBLISHING | U GOTTA BE CRAZY | 50    | CZECH REPUBLIC |
| 20021   | AJARON PUBLISHING | WAY I FEEL       | 50    | NORWAY         |
| 20021   | AJARON PUBLISHING | WAY I FEEL       | 50    | POLAND         |
| 20021   | AJARON PUBLISHING | WAY I FEEL       | 50    | SOUTH AFRICA   |
| 20021   | AJARON PUBLISHING | WAY I FEEL       | 50    | SWITZERLAND    |
| 20021   | AJARON PUBLISHING | WAY I FEEL       | 50    | SWITZERLAND    |
| 20024   | AJARON PUBLISHING | U GOTTA BE CRAZY | 50    | CANADA         |

[illegible]



[illegible]

[illegible]

[illegible]

|       |                   |                  |    |                |
|-------|-------------------|------------------|----|----------------|
| 20044 | AJARON PUBLISHING | WAY I FEEL       | 50 | POLAND         |
| 20044 | AJARON PUBLISHING | WAY I FEEL       | 50 | POLAND         |
| 20044 | AJARON PUBLISHING | WAY I FEEL       | 50 | POLAND         |
| 20044 | AJARON PUBLISHING | WAY I FEEL       | 50 | POLAND         |
| 20044 | AJARON PUBLISHING | WAY I FEEL       | 50 | POLAND         |
| 20044 | AJARON PUBLISHING | WAY I FEEL       | 50 | POLAND         |
| 20044 | AJARON PUBLISHING | WAY I FEEL       | 50 | POLAND         |
| 20044 | AJARON PUBLISHING | WAY I FEEL       | 50 | POLAND         |
| 20044 | AJARON PUBLISHING | WAY I FEEL       | 50 | POLAND         |
| 20044 | AJARON PUBLISHING | WAY I FEEL       | 50 | POLAND         |
| 20044 | AJARON PUBLISHING | WAY I FEEL       | 50 | POLAND         |
| 20044 | AJARON PUBLISHING | WAY I FEEL       | 50 | POLAND         |
| 20044 | AJARON PUBLISHING | WAY I FEEL       | 50 | POLAND         |
| 20044 | AJARON PUBLISHING | WAY I FEEL       | 50 | POLAND         |
| 20044 | AJARON PUBLISHING | WAY I FEEL       | 50 | POLAND         |
| 20044 | AJARON PUBLISHING | WAY I FEEL       | 50 | POLAND         |
| 20044 | AJARON PUBLISHING | WAY I FEEL       | 50 | POLAND         |
| 20044 | AJARON PUBLISHING | WAY I FEEL       | 50 | POLAND         |
| 20044 | AJARON PUBLISHING | WAY I FEEL       | 50 | POLAND         |
| 20062 | AJARON PUBLISHING | WAY I FEEL       | 50 | PORTUGAL       |
| 20062 | AJARON PUBLISHING | WAY I FEEL       | 50 | CZECH REPUBLIC |
| 20062 | AJARON PUBLISHING | WAY I FEEL       | 50 | ESTONIA        |
| 20062 | AJARON PUBLISHING | WAY I FEEL       | 50 | IRELAND        |
| 20062 | AJARON PUBLISHING | WAY I FEEL       | 50 | JAPAN          |
| 20062 | AJARON PUBLISHING | WAY I FEEL       | 50 | NETHERLANDS    |
| 20062 | AJARON PUBLISHING | WAY I FEEL       | 50 | PHILIPPINES    |
| 20062 | AJARON PUBLISHING | WAY I FEEL       | 50 | POLAND         |
| 20062 | AJARON PUBLISHING | WAY I FEEL       | 50 | POLAND         |
| 20062 | AJARON PUBLISHING | WAY I FEEL       | 50 | POLAND         |
| 20062 | AJARON PUBLISHING | WAY I FEEL       | 50 | POLAND         |
| 20062 | AJARON PUBLISHING | WAY I FEEL       | 50 | POLAND         |
| 20062 | AJARON PUBLISHING | WAY I FEEL       | 50 | POLAND         |
| 20062 | AJARON PUBLISHING | WAY I FEEL       | 50 | POLAND         |
| 20062 | AJARON PUBLISHING | WAY I FEEL       | 50 | POLAND         |
| 20062 | AJARON PUBLISHING | WAY I FEEL       | 50 | POLAND         |
| 20062 | AJARON PUBLISHING | WAY I FEEL       | 50 | POLAND         |
| 20062 | AJARON PUBLISHING | WAY I FEEL       | 50 | POLAND         |
| 20062 | AJARON PUBLISHING | WAY I FEEL       | 50 | POLAND         |
| 20062 | AJARON PUBLISHING | U GOTTA BE CRAZY | 50 | REP OF KOREA   |
| 20062 | AJARON PUBLISHING | WAY I FEEL       | 50 | REP OF KOREA   |
| 20062 | AJARON PUBLISHING | WAY I FEEL       | 50 | REP OF KOREA   |
| 20062 | AJARON PUBLISHING | WAY I FEEL       | 50 | UNITED KINGDOM |
| 20062 | AJARON PUBLISHING | WAY I FEEL       | 50 | UNITED KINGDOM |

|  |                                       |                   |
|--|---------------------------------------|-------------------|
| <b>AJARON PUBLISHING Total</b>               |                                       |                   |
| 20062  | LEDFOORD, ALTHEA ALI WAY I FEEL       | 50 CZECH REPUBLIC |
| 20062  | LEDFOORD, ALTHEA ALI WAY I FEEL       | 50 ESTONIA        |
| 20062  | LEDFOORD, ALTHEA ALI WILL             | 25 GREECE         |
| 20062  | LEDFOORD, ALTHEA ALI WAY I FEEL       | 50 IRELAND        |
| 20062  | LEDFOORD, ALTHEA ALI WAY I FEEL       | 50 JAPAN          |
| 20062  | LEDFOORD, ALTHEA ALI WAY I FEEL       | 50 NETHERLANDS    |
| 20062  | LEDFOORD, ALTHEA ALI WAY I FEEL       | 50 PHILIPPINES    |
| 20062  | LEDFOORD, ALTHEA ALI WAY I FEEL       | 50 POLAND         |
| 20062  | LEDFOORD, ALTHEA ALI WAY I FEEL       | 50 POLAND         |
| 20062  | LEDFOORD, ALTHEA ALI WAY I FEEL       | 50 POLAND         |
| 20062  | LEDFOORD, ALTHEA ALI WAY I FEEL       | 50 POLAND         |
| 20062  | LEDFOORD, ALTHEA ALI WAY I FEEL       | 50 POLAND         |
| 20062  | LEDFOORD, ALTHEA ALI WAY I FEEL       | 50 POLAND         |
| 20062  | LEDFOORD, ALTHEA ALI WAY I FEEL       | 50 POLAND         |
| 20062  | LEDFOORD, ALTHEA ALI WAY I FEEL       | 50 POLAND         |
| 20062  | LEDFOORD, ALTHEA ALI WAY I FEEL       | 50 POLAND         |
| 20062  | LEDFOORD, ALTHEA ALI WAY I FEEL       | 50 POLAND         |
| 20062  | LEDFOORD, ALTHEA ALI WAY I FEEL       | 50 POLAND         |
| 20062  | LEDFOORD, ALTHEA ALI WAY I FEEL       | 50 POLAND         |
| 20062  | LEDFOORD, ALTHEA ALI WAY I FEEL       | 50 POLAND         |
| 20062  | LEDFOORD, ALTHEA ALI WAY I FEEL       | 50 POLAND         |
| 20062  | LEDFOORD, ALTHEA ALI WAY I FEEL       | 50 POLAND         |
| 20062  | LEDFOORD, ALTHEA ALI WAY I FEEL       | 50 POLAND         |
| 20062  | LEDFOORD, ALTHEA ALI WAY I FEEL       | 50 POLAND         |
| 20062  | LEDFOORD, ALTHEA ALI U GOTTA BE CRAZY | 50 REP OF KOREA   |
| 20062  | LEDFOORD, ALTHEA ALI U GOTTA BE CRAZY | 50 REP OF KOREA   |
| 20062  | LEDFOORD, ALTHEA ALI WAY I FEEL       | 50 REP OF KOREA   |
| 20062  | LEDFOORD, ALTHEA ALI WAY I FEEL       | 50 REP OF KOREA   |
| 20062  | LEDFOORD, ALTHEA ALI WAY I FEEL       | 50 UNITED KINGDOM |
| 20062  | LEDFOORD, ALTHEA ALI WAY I FEEL       | 50 UNITED KINGDOM |
| <b>LEDFOORD, ALTHEA ALLEN/MARK AAR Total</b> |                                       |                   |
| 19994  | LEDFOORD, MARK AAR(WAY I FEEL         | 50 JAPAN          |
| 19994  | LEDFOORD, MARK AAR(WAY I FEEL         | 50 JAPAN          |
| 20001  | LEDFOORD, MARK AAR(U GOTTA BE CRAZY   | 50 JAPAN          |
| 20001  | LEDFOORD, MARK AAR(WAY I FEEL         | 50 JAPAN          |
| 20001  | LEDFOORD, MARK AAR(WAY I FEEL         | 50 JAPAN          |
| 20001  | LEDFOORD, MARK AAR(WAY I FEEL         | 50 JAPAN          |
| 20001  | LEDFOORD, MARK AAR(WAY I FEEL         | 50 JAPAN          |
| 20001  | LEDFOORD, MARK AAR(WAY I FEEL         | 50 JAPAN          |
| 20001  | LEDFOORD, MARK AAR(WAY I FEEL         | 50 NORWAY         |
| 20002  | LEDFOORD, MARK AAR(I WILL             | 25 JAPAN          |
| 20002  | LEDFOORD, MARK AAR(WAY I FEEL         | 50 JAPAN          |
| 20002  | LEDFOORD, MARK AAR(WAY I FEEL         | 50 JAPAN          |
| 20002  | LEDFOORD, MARK AAR(U GOTTA BE CRAZY   | 50 SPAIN          |
| 20002  | LEDFOORD, MARK AAR(U GOTTA BE CRAZY   | 50 SPAIN          |
| 20002  | LEDFOORD, MARK AAR(U GOTTA BE CRAZY   | 50 SPAIN          |
| 20002  | LEDFOORD, MARK AAR(U GOTTA BE CRAZY   | 50 SPAIN          |
| 20002  | LEDFOORD, MARK AAR(U GOTTA BE CRAZY   | 50 SPAIN          |
| 20002  | LEDFOORD, MARK AAR(U GOTTA BE CRAZY   | 50 SWITZERLAND    |
| 20002  | LEDFOORD, MARK AAR(WAY I FEEL         | 50 SWITZERLAND    |
| 20003  | LEDFOORD, MARK AAR(WAY I FEEL         | 50 JAPAN          |
| 20003  | LEDFOORD, MARK AAR(WAY I FEEL         | 50 NETHERLANDS    |



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[illegible]

[illegible]

[illegible]

| performance period   | earnings  |
|----------------------|-----------|
| Dist 1998-12         | \$ 12.04  |
| Dist 1998-12         | \$ 21.33  |
| Dist. 1999-03        | \$ 172.64 |
| Dist. 1999-03        | \$ 10.73  |
| Dist. 1999-03        | \$ 448.24 |
| 1999-06              | \$ 3.38   |
| 1999-06              | \$ 7.30   |
| 1999-06              | \$ 9.70   |
| Public Perf. 1998/1  | \$ 291.72 |
| Dist. No. 25 & 27    | \$ 0.65   |
| Dist. No. 25 & 27    | \$ 0.64   |
| Dist. No. 25 & 27    | \$ 0.64   |
| Dist. No. 25 & 27    | \$ 0.64   |
| Dist. No. 25 & 27    | \$ 0.64   |
| RD & TV 1998         | \$ 7.77   |
| RD & TV 1998         | \$ 94.97  |
| FL 98/GN 98/VARIOUS  | \$ 140.00 |
| FL 98/GN 98/VARIOUS  | \$ 169.80 |
| FL 98/GN 98/VARIOUS  | \$ 18.59  |
| Various 1998         | \$ 3.35   |
| RADIO 1998 & MISC    | \$ 7.83   |
| 01/01/99 - 06/30/99  | \$ 20.42  |
| RDTV99/1 FL99 ADJ98  | \$ 128.07 |
| Warsaw/Undoc/NSD38   | \$ 19.50  |
| Dist 1/00            | \$ 0.72   |
| Dist 1/00            | \$ 0.71   |
| Dist 1/00            | \$ 4.29   |
| Dist 1/00            | \$ 0.72   |
| Dist 1/00            | \$ 1.43   |
| SBC 2HF/99 PRVT 1999 | \$ 5.19   |
| Various 1999/00      | \$ 1.67   |
| FL 1999/GN 1999      | \$ 8.05   |
| FL 1999/GN 1999      | \$ 1.07   |
| FL 1999/GN 1999      | \$ 4.30   |
| Dist. No 39          | \$ 4.37   |
| Dist No 2/00         | \$ 0.61   |
| Dist No 2/00         | \$ 0.58   |
| Dist No 2/00         | \$ 1.76   |
| Dist No 2/00         | \$ 0.61   |
| Dist No 2/00         | \$ 0.58   |
| Dist No 2/00         | \$ 0.58   |
| 1999 Blank Tape      | \$ 0.15   |
| SBC/MECH RD/TV 1/00  | \$ 6.20   |
| RDTVGN/000 RD2001/1  | \$ 1.27   |
| 1/2000-12/2000       | \$ 5.07   |
| Small Rights 97-01   | \$ 3.09   |
| SUPPLEMENT DIST 39   | \$ 38.14  |
| 2000 DISTRIBUTION    | \$ 22.19  |
| PRIVATE TV 2000      | \$ 0.30   |
| 3RD QTR 2001 DIST.   | \$ 4.75   |



|                      |    |       |
|----------------------|----|-------|
| 3RD QTR 2001 DIST.   | \$ | 9.62  |
| SM. RIGHTS 1996/2001 | \$ | 0.76  |
| SM. RIGHTS 1996/2001 | \$ | 0.76  |
| SM. RIGHTS 1996/2001 | \$ | 0.76  |
| SM. RIGHTS 1996/2001 | \$ | 0.40  |
| SM. RIGHTS 1996/2001 | \$ | 0.41  |
| SM. RIGHTS 1996/2001 | \$ | 0.41  |
| SM. RIGHTS 1996/2001 | \$ | 0.40  |
| SM. RIGHTS 1996/2001 | \$ | 0.40  |
| SM. RIGHTS 1996/2001 | \$ | 0.41  |
| SM. RIGHTS 1996/2001 | \$ | 0.41  |
| SM. RIGHTS 1996/2001 | \$ | 0.41  |
| SM. RIGHTS 1996/2001 | \$ | 0.41  |
| SM. RIGHTS 1996/2001 | \$ | 0.41  |
| SM. RIGHTS 1996/2001 | \$ | 0.41  |
| SM. RIGHTS 1996/2001 | \$ | 0.41  |
| SM. RIGHTS 1996/2001 | \$ | 0.77  |
| SM. RIGHTS 1996/2001 | \$ | 0.77  |
| SM. RIGHTS 1996/2001 | \$ | 3.58  |
| SM. RIGHTS 1996/2001 | \$ | 3.58  |
| 07/01/00 - 06/30/01  | \$ | 19.90 |
| 07/01/00 - 06/30/01  | \$ | 3.85  |
| 01/01/01 - 06/30/01  | \$ | 17.03 |
| SM RIGHTS 1992-2000  | \$ | 9.10  |
| SM RIGHTS 1992-2000  | \$ | 17.24 |
| SM RIGHTS 1992-2000  | \$ | 11.35 |
| SM RIGHTS 1992-2000  | \$ | 9.12  |
| PERF & BRDCST 2001   | \$ | 18.59 |
| FL/GN/TV 1991-2000   | \$ | 0.07  |
| 1999/2000/2001 DIST. | \$ | 8.59  |
| SM. RIGHTS 1999-2002 | \$ | 0.07  |
| SM. RIGHTS 1999-2002 | \$ | 0.07  |
| SM. RIGHTS 1999-2002 | \$ | 0.07  |
| SM. RIGHTS 1999-2002 | \$ | 0.07  |
| SM. RIGHTS 1999-2002 | \$ | 0.07  |
| SM. RIGHTS 1999-2002 | \$ | 0.14  |
| SM. RIGHTS 1999-2002 | \$ | 0.06  |
| SM. RIGHTS 1999-2002 | \$ | 0.06  |
| SM. RIGHTS 1999-2002 | \$ | 0.06  |
| SM. RIGHTS 1999-2002 | \$ | 0.06  |
| SM. RIGHTS 1999-2002 | \$ | 0.35  |
| SM. RIGHTS 1999-2002 | \$ | 0.35  |
| SM. RIGHTS 1999-2002 | \$ | 0.36  |
| SM. RIGHTS 1999-2002 | \$ | 0.36  |
| SM. RIGHTS 1999-2002 | \$ | 0.68  |
| SM. RIGHTS 1999-2002 | \$ | 0.68  |
| SM. RIGHTS 1999-2002 | \$ | 0.68  |
| SM. RIGHTS 1999-2002 | \$ | 0.35  |
| SM. RIGHTS 1999-2002 | \$ | 0.68  |

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|                      |    |       |
|----------------------|----|-------|
| RD 01-02,GN 7-12/03  | \$ | 0.94  |
| RD 01-02,GN 7-12/03  | \$ | 0.94  |
| RD 01-02,GN 7-12/03  | \$ | 0.94  |
| RD 01-02,GN 7-12/03  | \$ | 0.94  |
| RD 01-02,GN 7-12/03  | \$ | 0.94  |
| RD 01-02,GN 7-12/03  | \$ | 0.94  |
| RD 01-02,GN 7-12/03  | \$ | 0.94  |
| RD 01-02,GN 7-12/03  | \$ | 0.94  |
| RD 01-02,GN 7-12/03  | \$ | 0.94  |
| RD 01-02,GN 7-12/03  | \$ | 0.94  |
| RD 01-02,GN 7-12/03  | \$ | 0.94  |
| RD 01-02,GN 7-12/03  | \$ | 0.94  |
| RD 01-02,GN 7-12/03  | \$ | 0.50  |
| RD 01-02,GN 7-12/03  | \$ | 0.50  |
| RD 01-02,GN 7-12/03  | \$ | 0.50  |
| RD 01-02,GN 7-12/03  | \$ | 0.50  |
| RD 01-02,GN 7-12/03  | \$ | 0.50  |
| RD 01-02,GN 7-12/03  | \$ | 0.50  |
| RD 01-02,GN 7-12/03  | \$ | 0.50  |
| RD 01-02,GN 7-12/03  | \$ | 0.50  |
| RD 01-02,GN 7-12/03  | \$ | 0.50  |
| RD 01-02,GN 7-12/03  | \$ | 0.86  |
| VARIOUS 2000-2003    | \$ | 0.53  |
| 01/01/04 - 03/31/05  | \$ | 3.10  |
| 01/01/03 - 12/31/03  | \$ | 0.81  |
| 01/01/05 - 06/30/05  | \$ | 0.85  |
| DISTRIBUTION 2004-09 | \$ | 5.78  |
| 2003                 | \$ | 8.04  |
| GENERAL DIST. 2003A  | \$ | 1.84  |
| TV 2000-2003 ADJUST. | \$ | 0.11  |
| TV 2000-2003 ADJUST. | \$ | 0.11  |
| TV 2000-2003 ADJUST. | \$ | 0.13  |
| TV 2000-2003 ADJUST. | \$ | 0.13  |
| TV 2000-2003 ADJUST. | \$ | 0.10  |
| TV 2000-2003 ADJUST. | \$ | 0.12  |
| TV 2000-2003 ADJUST. | \$ | 0.10  |
| TV 2000-2003 ADJUST. | \$ | 0.13  |
| TV 2000-2003 ADJUST. | \$ | 0.13  |
| TV 2000-2003 ADJUST. | \$ | 0.24  |
| TV 2000-2003 ADJUST. | \$ | 0.24  |
| TV 2000-2003 ADJUST. | \$ | 0.13  |
| TV 2000-2003 ADJUST. | \$ | 0.24  |
| 04/01/04 - 12/31/04  | \$ | 3.21  |
| 01/01/05 - 12/31/05  | \$ | 9.94  |
| 01/01/00 - 12/31/03  | \$ | 7.06  |
| 01/01/03 - 12/31/04  | \$ | 1.26  |
| 01/01/00 - 12/31/04  | \$ | 14.23 |
| DIST 2005071         | \$ | 2.97  |
| 09/01/05 - 10/01/05  | \$ | 1.75  |

|                      |             |
|----------------------|-------------|
|                      | \$ 2,267.84 |
| 01/01/04 - 03/31/05  | \$ 3.10     |
| 01/01/03 - 12/31/03  | \$ 0.81     |
| 01/01/02 - 12/31/02  | \$ 4.18     |
| 01/01/05 - 06/30/05  | \$ 0.85     |
| DISTRIBUTION 2004-09 | \$ 5.78     |
| 2003                 | \$ 8.04     |
| GENERAL DIST. 2003A  | \$ 1.84     |
| TV 2000-2003 ADJUST. | \$ 0.11     |
| TV 2000-2003 ADJUST. | \$ 0.12     |
| TV 2000-2003 ADJUST. | \$ 0.13     |
| TV 2000-2003 ADJUST. | \$ 0.13     |
| TV 2000-2003 ADJUST. | \$ 0.10     |
| TV 2000-2003 ADJUST. | \$ 0.12     |
| TV 2000-2003 ADJUST. | \$ 0.10     |
| TV 2000-2003 ADJUST. | \$ 0.13     |
| TV 2000-2003 ADJUST. | \$ 0.13     |
| TV 2000-2003 ADJUST. | \$ 0.24     |
| TV 2000-2003 ADJUST. | \$ 0.24     |
| TV 2000-2003 ADJUST. | \$ 0.13     |
| TV 2000-2003 ADJUST. | \$ 0.24     |
| 04/01/04 - 12/31/04  | \$ 3.22     |
| 01/01/05 - 12/31/05  | \$ 9.94     |
| 01/01/00 - 12/31/03  | \$ 7.07     |
| 01/01/00 - 12/31/03  | \$ 6.82     |
| 01/01/03 - 12/31/04  | \$ 1.26     |
| 01/01/00 - 12/31/04  | \$ 8.65     |
| DIST 2005071         | \$ 2.97     |
| 09/01/05 - 10/01/05  | \$ 1.75     |
|                      | \$ 68.20    |
| Dist 1998-12         | \$ 12.04    |
| Dist 1998-12         | \$ 21.33    |
| Dist. 1999-03        | \$ 172.64   |
| Dist. 1999-03        | \$ 10.73    |
| Dist. 1999-03        | \$ 446.24   |
| 1999-06              | \$ 3.38     |
| 1999-06              | \$ 7.30     |
| 1999-06              | \$ 9.70     |
| Public Perf. 1998/1  | \$ 291.72   |
| 1999-09              | \$ 6.57     |
| 1999-09              | \$ 76.72    |
| 1999-09              | \$ 76.92    |
| Dist. No. 25 & 27    | \$ 0.65     |
| Dist. No. 25 & 27    | \$ 0.64     |
| Dist. No. 25 & 27    | \$ 0.64     |
| Dist. No. 25 & 27    | \$ 0.64     |
| Dist. No. 25 & 27    | \$ 0.64     |
| RD & TV 1998         | \$ 7.77     |
| RD & TV 1998         | \$ 94.97    |
| 1999-12              | \$ 22.62    |
| FL 98/GN 98/VARIOUS  | \$ 140.00   |



|                      |    |        |
|----------------------|----|--------|
| FL 98/GN 98/VARIOUS  | \$ | 169.80 |
| FL 98/GN 98/VARIOUS  | \$ | 18.59  |
| Various 1998         | \$ | 3.34   |
| RADIO 1998 & MISC    | \$ | 7.83   |
| DIST. 2000-03        | \$ | 500.18 |
| 01/01/99 - 06/30/99  | \$ | 20.42  |
| RDTV99/1 FL99 ADJ98  | \$ | 128.07 |
| Warsaw/Undoc/NSD38   | \$ | 19.49  |
| Dist 1/00            | \$ | 0.37   |
| Dist 1/00            | \$ | 0.71   |
| Dist 1/00            | \$ | 4.29   |
| Dist 1/00            | \$ | 0.72   |
| Dist 1/00            | \$ | 1.43   |
| SBC 2HF/99 PRVT 1999 | \$ | 5.19   |
| Various 1999/00      | \$ | 1.67   |
| 1999 General Dist.   | \$ | 13.77  |
| Dist. of 11/2000     | \$ | 17.28  |
| Dist. No 39          | \$ | 4.37   |
| Dist No 2/00         | \$ | 0.61   |
| Dist No 2/00         | \$ | 0.58   |
| Dist No 2/00         | \$ | 1.76   |
| Dist No 2/00         | \$ | 0.61   |
| Dist No 2/00         | \$ | 0.58   |
| Dist No 2/00         | \$ | 0.58   |
| 1999 Blank Tape      | \$ | 0.15   |
| 4th Quarter 2000     | \$ | 9.71   |
| DISTRIBUTION 2001-06 | \$ | 0.96   |
| FL 1999/GN 1999      | \$ | 1.08   |
| FL 1999/GN 1999      | \$ | 4.30   |
| FL 1999/GN 1999      | \$ | 8.04   |
| SUPPLEMENT DIST 39   | \$ | 38.14  |
| SBC/MECH RD/TV 1/00  | \$ | 6.20   |
| 2000 DISTRIBUTION    | \$ | 22.19  |
| RDTVGN/000 RD2001/1  | \$ | 1.27   |
| RD88-99/TV93-99/N00  | \$ | 0.02   |
| DIST 01-12 04-06/01  | \$ | 18.77  |
| 1/2000-12/2000       | \$ | 5.07   |
| Small Rights 97-01   | \$ | 3.09   |
| SM. RIGHTS 1996/2001 | \$ | 0.75   |
| SM. RIGHTS 1996/2001 | \$ | 0.76   |
| SM. RIGHTS 1996/2001 | \$ | 0.76   |
| SM. RIGHTS 1996/2001 | \$ | 0.41   |
| SM. RIGHTS 1996/2001 | \$ | 0.41   |
| SM. RIGHTS 1996/2001 | \$ | 0.41   |
| SM. RIGHTS 1996/2001 | \$ | 0.41   |
| SM. RIGHTS 1996/2001 | \$ | 0.41   |
| SM. RIGHTS 1996/2001 | \$ | 0.41   |
| SM. RIGHTS 1996/2001 | \$ | 0.41   |
| SM. RIGHTS 1996/2001 | \$ | 0.41   |
| SM. RIGHTS 1996/2001 | \$ | 0.41   |
| SM. RIGHTS 1996/2001 | \$ | 0.41   |

|                      |    |       |
|----------------------|----|-------|
| SM. RIGHTS 1996/2001 | \$ | 0.41  |
| SM. RIGHTS 1996/2001 | \$ | 0.41  |
| SM. RIGHTS 1996/2001 | \$ | 0.41  |
| SM. RIGHTS 1996/2001 | \$ | 0.41  |
| SM. RIGHTS 1996/2001 | \$ | 0.77  |
| SM. RIGHTS 1996/2001 | \$ | 0.77  |
| SM. RIGHTS 1996/2001 | \$ | 3.58  |
| SM. RIGHTS 1996/2001 | \$ | 3.58  |
| PRIVATE TV 2000      | \$ | 0.30  |
| 01/01/01 - 06/30/01  | \$ | 17.03 |
| 3RD QTR 2001 DIST.   | \$ | 4.75  |
| 3RD QTR 2001 DIST.   | \$ | 9.62  |
| SM RIGHTS 1992-2000  | \$ | 9.10  |
| SM RIGHTS 1992-2000  | \$ | 17.24 |
| SM RIGHTS 1992-2000  | \$ | 11.35 |
| SM RIGHTS 1992-2000  | \$ | 9.12  |
| 01/01/01 - 12/31/01  | \$ | 3.03  |
| 01/01/01 - 12/31/01  | \$ | 3.15  |
| 07/01/00 - 06/30/01  | \$ | 19.90 |
| 07/01/00 - 06/30/01  | \$ | 3.85  |
| PERF & BRDCST 2001   | \$ | 18.59 |
| FL/GN/TV 1991-2000   | \$ | 0.10  |
| FL/GN/TV 1991-2000   | \$ | 0.02  |
| FL/GN/TV 1991-2000   | \$ | 5.29  |
| FL/GN/TV 1991-2000   | \$ | 0.07  |
| 1999/2000/2001 DIST. | \$ | 8.59  |
| SM. RIGHTS 1999-2002 | \$ | 0.07  |
| SM. RIGHTS 1999-2002 | \$ | 0.07  |
| SM. RIGHTS 1999-2002 | \$ | 0.07  |
| SM. RIGHTS 1999-2002 | \$ | 0.07  |
| SM. RIGHTS 1999-2002 | \$ | 0.07  |
| SM. RIGHTS 1999-2002 | \$ | 0.14  |
| SM. RIGHTS 1999-2002 | \$ | 0.06  |
| SM. RIGHTS 1999-2002 | \$ | 0.07  |
| SM. RIGHTS 1999-2002 | \$ | 0.07  |
| SM. RIGHTS 1999-2002 | \$ | 0.07  |
| SM. RIGHTS 1999-2002 | \$ | 0.35  |
| SM. RIGHTS 1999-2002 | \$ | 0.35  |
| SM. RIGHTS 1999-2002 | \$ | 0.36  |
| SM. RIGHTS 1999-2002 | \$ | 0.36  |
| SM. RIGHTS 1999-2002 | \$ | 0.68  |
| SM. RIGHTS 1999-2002 | \$ | 0.68  |
| SM. RIGHTS 1999-2002 | \$ | 0.68  |
| SM. RIGHTS 1999-2002 | \$ | 0.35  |
| SM. RIGHTS 1999-2002 | \$ | 0.68  |
| SM. RIGHTS 1999-2002 | \$ | 0.68  |
| SM. RIGHTS 1999-2002 | \$ | 3.29  |
| NON-ROY. REVENUE 41  | \$ | 9.24  |
| NON-ROY. REVENUE 41  | \$ | 1.79  |
| 01/01/02 - 06/30/02  | \$ | 21.97 |
| 2001 BLANK TAPE ROY. | \$ | 0.38  |

|                      |    |       |
|----------------------|----|-------|
| 2001 BLANK TAPE ROY. | \$ | 0.35  |
| FL/RD/TV 1993-2002   | \$ | 5.76  |
| FL/RD/TV 1993-2002   | \$ | 0.32  |
| FL/RD/TV 1993-2002   | \$ | 8.19  |
| FL/RD/TV 1993-2002   | \$ | 1.92  |
| FL/RD/TV 1993-2002   | \$ | 50.38 |
| FL/RD/TV 1993-2002   | \$ | 12.33 |
| FL/RD/TV 1993-2002   | \$ | 5.05  |
| FL/RD/TV 1993-2002   | \$ | 1.28  |
| FL/RD/TV 1993-2002   | \$ | 4.62  |
| FL/RD/TV 1993-2002   | \$ | 0.32  |
| DISTRIBUTION 2003-03 | \$ | 63.02 |
| DISTRIBUTION 2003-03 | \$ | 63.04 |
| SMALL RIGHTS 2002    | \$ | 5.77  |
| VAR.GN/FL 1998-2001  | \$ | 5.50  |
| VAR.GN/FL 1998-2001  | \$ | 0.10  |
| VAR.GN/FL 1998-2001  | \$ | 3.37  |
| DISTRIBUTION 2002-A  | \$ | 3.53  |
| DIST.2000-2002/SUPP. | \$ | 0.53  |
| DIST.2000-2002/SUPP. | \$ | 0.54  |
| DIST.2000-2002/SUPP. | \$ | 0.55  |
| DIST.2000-2002/SUPP. | \$ | 0.55  |
| DIST.2000-2002/SUPP. | \$ | 0.41  |
| DIST.2000-2002/SUPP. | \$ | 0.49  |
| DIST.2000-2002/SUPP. | \$ | 0.41  |
| DIST.2000-2002/SUPP. | \$ | 0.54  |
| DIST.2000-2002/SUPP. | \$ | 0.55  |
| DIST.2000-2002/SUPP. | \$ | 1.04  |
| DIST.2000-2002/SUPP. | \$ | 1.04  |
| DIST.2000-2002/SUPP. | \$ | 0.55  |
| DIST.2000-2002/SUPP. | \$ | 1.04  |
| GN/RD/TV/FL 2002     | \$ | 28.40 |
| Blank Tape Roy. 2002 | \$ | 1.74  |
| 01/01/00 - 12/31/02  | \$ | 5.43  |
| 01/01/00 - 12/31/02  | \$ | 2.63  |
| 04/01/03 - 06/30/03  | \$ | 1.28  |
| 04/01/03 - 06/30/03  | \$ | 1.28  |
| RD 01-02,GN 7-12/03  | \$ | 0.08  |
| RD 01-02,GN 7-12/03  | \$ | 0.08  |
| RD 01-02,GN 7-12/03  | \$ | 0.17  |
| RD 01-02,GN 7-12/03  | \$ | 0.08  |
| RD 01-02,GN 7-12/03  | \$ | 0.17  |
| RD 01-02,GN 7-12/03  | \$ | 0.48  |
| RD 01-02,GN 7-12/03  | \$ | 0.48  |
| RD 01-02,GN 7-12/03  | \$ | 0.92  |
| RD 01-02,GN 7-12/03  | \$ | 0.92  |
| RD 01-02,GN 7-12/03  | \$ | 0.92  |
| RD 01-02,GN 7-12/03  | \$ | 0.92  |
| RD 01-02,GN 7-12/03  | \$ | 0.92  |
| RD 01-02,GN 7-12/03  | \$ | 0.92  |

[illegible]

[illegible]

|                     |    |           |
|---------------------|----|-----------|
| RD 01-02,GN 7-12/03 | \$ | 0.94      |
| RD 01-02,GN 7-12/03 | \$ | 0.94      |
| RD 01-02,GN 7-12/03 | \$ | 0.94      |
| RD 01-02,GN 7-12/03 | \$ | 0.94      |
| RD 01-02,GN 7-12/03 | \$ | 0.94      |
| RD 01-02,GN 7-12/03 | \$ | 0.94      |
| RD 01-02,GN 7-12/03 | \$ | 0.94      |
| RD 01-02,GN 7-12/03 | \$ | 0.94      |
| RD 01-02,GN 7-12/03 | \$ | 0.94      |
| RD 01-02,GN 7-12/03 | \$ | 0.94      |
| RD 01-02,GN 7-12/03 | \$ | 0.94      |
| RD 01-02,GN 7-12/03 | \$ | 0.94      |
| RD 01-02,GN 7-12/03 | \$ | 0.94      |
| RD 01-02,GN 7-12/03 | \$ | 0.94      |
| RD 01-02,GN 7-12/03 | \$ | 0.94      |
| RD 01-02,GN 7-12/03 | \$ | 0.94      |
| RD 01-02,GN 7-12/03 | \$ | 0.94      |
| RD 01-02,GN 7-12/03 | \$ | 0.94      |
| RD 01-02,GN 7-12/03 | \$ | 0.94      |
| RD 01-02,GN 7-12/03 | \$ | 0.50      |
| RD 01-02,GN 7-12/03 | \$ | 0.50      |
| RD 01-02,GN 7-12/03 | \$ | 0.50      |
| RD 01-02,GN 7-12/03 | \$ | 0.50      |
| RD 01-02,GN 7-12/03 | \$ | 0.50      |
| RD 01-02,GN 7-12/03 | \$ | 0.50      |
| RD 01-02,GN 7-12/03 | \$ | 0.50      |
| RD 01-02,GN 7-12/03 | \$ | 0.50      |
| RD 01-02,GN 7-12/03 | \$ | 0.50      |
| RD 01-02,GN 7-12/03 | \$ | 0.86      |
| VARIOUS 2000-2003   | \$ | 0.53      |
| 01/01/03 - 06/30/03 | \$ | 15.97     |
|                     | \$ | 3,076.88  |
|                     | \$ | 5,412.92  |
|                     | \$ | 16,238.76 |



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RODRIGUEZ, JOSE BARRAGAN, ANDY BARILLAS and  
EDUARDO SANCHEZ

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

ALTHEA LEDFORD, individually, and as )  
the successor in interest of MARK A. )  
LEDFORD, deceased,, )

Plaintiff,

vs.

CITY OF INGLEWOOD, et al.,

Defendants.

Case No. CV 06-06796 ODW (PLAx)  
Honorable Otis D. Wright II

**DEFENDANT CITY OF  
INGLEWOOD'S REQUEST FOR  
ADMISSIONS TO PLAINTIFF  
ALTHEA LEDFORD, SET ONE**

PROPOUNDING PARTY: DEFENDANT CITY OF INGLEWOOD  
RESPONDING PARTY: PLAINTIFF ALTHEA LEDFORD  
SET NUMBER: ONE

Pursuant to California Code of Civil Procedure §§ 2033.010-2033.420, Defendant CITY OF INGLEWOOD hereby requests that Plaintiff ALTHEA LEDFORD admits or denies the following facts:

**REQUEST FOR ADMISSION NO. 1:**

Admit that for the tax year 1999, Mark Ledford's gross income was less than \$5,000.

**REQUEST FOR ADMISSION NO. 2:**

Admit that for the tax year 1999, Mark Ledford's gross income was less than \$10,000.

**REQUEST FOR ADMISSION NO. 3:**

Admit that for the tax year 1999, Mark Ledford's gross income was less than \$15,000.

**REQUEST FOR ADMISSION NO. 4:**

Admit that for the tax year 1999, Mark Ledford's gross income was less than \$20,000.

**REQUEST FOR ADMISSION NO. 5:**

Admit that for the tax year 1999, Mark Ledford's gross income was less than \$25,000.

**REQUEST FOR ADMISSION NO. 6:**

Admit that for the tax year 1999, Mark Ledford's gross income was less than \$50,000.

**REQUEST FOR ADMISSION NO. 7:**

Admit that for the tax year 1999, Mark Ledford's gross income was less than \$75,000.

**REQUEST FOR ADMISSION NO. 8:**

Admit that for the tax year 1999, Mark Ledford's gross income was less than \$100,000.

///

1 **REQUEST FOR ADMISSION NO. 9:**

2 Admit that for the tax year 1999, Mark Ledford's gross income was less than  
3 \$200,000.

4 **REQUEST FOR ADMISSION NO. 10:**

5 Admit that for the tax year 1999, Mark Ledford's gross income was less than  
6 \$250,000.

7 **REQUEST FOR ADMISSION NO. 11:**

8 Admit that for the tax year 1999, Mark Ledford's gross income was less than  
9 \$500,000.

10 **REQUEST FOR ADMISSION NO. 12:**

11 Admit that for the tax year 1999, Mark Ledford's gross income was less than  
12 \$1 million.

13 **REQUEST FOR ADMISSION NO. 13:**

14 Admit that for the tax year 2000, Mark Ledford's gross income was less than  
15 \$5,000.

16 **REQUEST FOR ADMISSION NO. 14:**

17 Admit that for the tax year 2000, Mark Ledford's gross income was less than  
18 \$10,000.

19 **REQUEST FOR ADMISSION NO. 15:**

20 Admit that for the tax year 2000, Mark Ledford's gross income was less than  
21 \$15,000.

22 **REQUEST FOR ADMISSION NO. 16:**

23 Admit that for the tax year 2000, Mark Ledford's gross income was less than  
24 \$20,000.

25 **REQUEST FOR ADMISSION NO. 17:**

26 Admit that for the tax year 2000, Mark Ledford's gross income was less than  
27 \$25,000.

28 ///

**REQUEST FOR ADMISSION NO. 18:**

Admit that for the tax year 2000, Mark Ledford's gross income was less than \$50,000.

**REQUEST FOR ADMISSION NO. 19:**

Admit that for the tax year 2000, Mark Ledford's gross income was less than \$75,000.

**REQUEST FOR ADMISSION NO. 20:**

Admit that for the tax year 2000, Mark Ledford's gross income was less than \$100,000.

**REQUEST FOR ADMISSION NO. 21:**

Admit that for the tax year 2000, Mark Ledford's gross income was less than \$200,000.

**REQUEST FOR ADMISSION NO. 22:**

Admit that for the tax year 2000, Mark Ledford's gross income was less than \$250,000.

**REQUEST FOR ADMISSION NO. 23:**

Admit that for the tax year 2000, Mark Ledford's gross income was less than \$500,000.

**REQUEST FOR ADMISSION NO. 24:**

Admit that for the tax year 2000, Mark Ledford's gross income was less than \$1 million.

**REQUEST FOR ADMISSION NO. 25:**

Admit that for the tax year 2001, Mark Ledford's gross income was less than \$5,000.

**REQUEST FOR ADMISSION NO. 26:**

Admit that for the tax year 2001, Mark Ledford's gross income was less than \$10,000.

///

1 **REQUEST FOR ADMISSION NO. 27:**

2 Admit that for the tax year 2001, Mark Ledford's gross income was less than  
3 \$15,000.

4 **REQUEST FOR ADMISSION NO. 28:**

5 Admit that for the tax year 2001, Mark Ledford's gross income was less than  
6 \$20,000.

7 **REQUEST FOR ADMISSION NO. 29:**

8 Admit that for the tax year 2001, Mark Ledford's gross income was less than  
9 \$25,000.

10 **REQUEST FOR ADMISSION NO. 30:**

11 Admit that for the tax year 2001, Mark Ledford's gross income was less than  
12 \$50,000.

13 **REQUEST FOR ADMISSION NO. 31:**

14 Admit that for the tax year 2001, Mark Ledford's gross income was less than  
15 \$75,000.

16 **REQUEST FOR ADMISSION NO. 32:**

17 Admit that for the tax year 2001, Mark Ledford's gross income was less than  
18 \$100,000.

19 **REQUEST FOR ADMISSION NO. 33:**

20 Admit that for the tax year 2001, Mark Ledford's gross income was less than  
21 \$200,000.

22 **REQUEST FOR ADMISSION NO. 34:**

23 Admit that for the tax year 2001, Mark Ledford's gross income was less than  
24 \$250,000.

25 **REQUEST FOR ADMISSION NO. 35:**

26 Admit that for the tax year 2001, Mark Ledford's gross income was less than  
27 \$500,000.

28 ///

**REQUEST FOR ADMISSION NO. 36:**

Admit that for the tax year 2001, Mark Ledford's gross income was less than \$1 million.

**REQUEST FOR ADMISSION NO. 37:**

Admit that for the tax year 2002, Mark Ledford's gross income was less than \$5,000.

**REQUEST FOR ADMISSION NO. 38:**

Admit that for the tax year 2002, Mark Ledford's gross income was less than \$10,000.

**REQUEST FOR ADMISSION NO. 39:**

Admit that for the tax year 2002, Mark Ledford's gross income was less than \$15,000.

**REQUEST FOR ADMISSION NO. 40:**

Admit that for the tax year 2002, Mark Ledford's gross income was less than \$20,000.

**REQUEST FOR ADMISSION NO. 41:**

Admit that for the tax year 2002, Mark Ledford's gross income was less than \$25,000.

**REQUEST FOR ADMISSION NO. 42:**

Admit that for the tax year 2002, Mark Ledford's gross income was less than \$50,000.

**REQUEST FOR ADMISSION NO. 43:**

Admit that for the tax year 2002, Mark Ledford's gross income was less than \$75,000.

**REQUEST FOR ADMISSION NO. 44:**

Admit that for the tax year 2002, Mark Ledford's gross income was less than \$100,000.

///



1 **REQUEST FOR ADMISSION NO. 45:**

2 Admit that for the tax year 2002, Mark Ledford's gross income was less than  
3 \$200,000.

4 **REQUEST FOR ADMISSION NO. 46:**

5 Admit that for the tax year 2002, Mark Ledford's gross income was less than  
6 \$250,000.

7 **REQUEST FOR ADMISSION NO. 47:**

8 Admit that for the tax year 2002, Mark Ledford's gross income was less than  
9 \$500,000.

10 **REQUEST FOR ADMISSION NO. 48:**

11 Admit that for the tax year 2002, Mark Ledford's gross income was less than  
12 \$1 million.

13 **REQUEST FOR ADMISSION NO. 49:**

14 Admit that for the tax year 2003, Mark Ledford's gross income was less than  
15 \$5,000.

16 **REQUEST FOR ADMISSION NO. 50:**

17 Admit that for the tax year 2003, Mark Ledford's gross income was less than  
18 \$10,000.

19 **REQUEST FOR ADMISSION NO. 51:**

20 Admit that for the tax year 2003, Mark Ledford's gross income was less than  
21 \$15,000.

22 **REQUEST FOR ADMISSION NO. 52:**

23 Admit that for the tax year 2003, Mark Ledford's gross income was less than  
24 \$20,000.

25 **REQUEST FOR ADMISSION NO. 53:**

26 Admit that for the tax year 2003, Mark Ledford's gross income was less than  
27 \$25,000.

28 ///

1 **REQUEST FOR ADMISSION NO. 54:**

2 Admit that for the tax year 2003, Mark Ledford's gross income was less than  
3 \$50,000.

4 **REQUEST FOR ADMISSION NO. 55:**

5 Admit that for the tax year 2003, Mark Ledford's gross income was less than  
6 \$75,000.

7 **REQUEST FOR ADMISSION NO. 56:**

8 Admit that for the tax year 2003, Mark Ledford's gross income was less than  
9 \$100,000.

10 **REQUEST FOR ADMISSION NO. 57:**

11 Admit that for the tax year 2003, Mark Ledford's gross income was less than  
12 \$200,000.

13 **REQUEST FOR ADMISSION NO. 58:**

14 Admit that for the tax year 2003, Mark Ledford's gross income was less than  
15 \$250,000.

16 **REQUEST FOR ADMISSION NO. 59:**

17 Admit that for the tax year 2003, Mark Ledford's gross income was less than  
18 \$500,000.

19 **REQUEST FOR ADMISSION NO. 60:**

20 Admit that for the tax year 2003, Mark Ledford's gross income was less than  
21 \$1 million.

22 **REQUEST FOR ADMISSION NO. 61:**

23 Admit that for the tax year 2004, Mark Ledford's gross income was less than  
24 \$5,000.

25 **REQUEST FOR ADMISSION NO. 62:**

26 Admit that for the tax year 2004, Mark Ledford's gross income was less than  
27 \$10,000.

28 ///

**REQUEST FOR ADMISSION NO. 63:**

Admit that for the tax year 2004, Mark Ledford's gross income was less than \$15,000.

**REQUEST FOR ADMISSION NO. 64:**

Admit that for the tax year 2004, Mark Ledford's gross income was less than \$20,000.

**REQUEST FOR ADMISSION NO. 65:**

Admit that for the tax year 2004, Mark Ledford's gross income was less than \$25,000.

**REQUEST FOR ADMISSION NO. 66:**

Admit that for the tax year 2004, Mark Ledford's gross income was less than \$50,000.

**REQUEST FOR ADMISSION NO. 67:**

Admit that for the tax year 2004, Mark Ledford's gross income was less than \$75,000.

**REQUEST FOR ADMISSION NO. 68:**

Admit that for the tax year 2004, Mark Ledford's gross income was less than \$100,000.

**REQUEST FOR ADMISSION NO. 69:**

Admit that for the tax year 2004, Mark Ledford's gross income was less than \$200,000.

**REQUEST FOR ADMISSION NO. 70:**

Admit that for the tax year 2004, Mark Ledford's gross income was less than \$250,000.

**REQUEST FOR ADMISSION NO. 71:**

Admit that for the tax year 2004, Mark Ledford's gross income was less than \$500,000.

///

1 **REQUEST FOR ADMISSION NO. 72:**

2 Admit that for the tax year 2004, Mark Ledford's gross income was less than  
3 \$1 million.

4 **REQUEST FOR ADMISSION NO. 73:**

5 Admit that for the tax year 1999, your income was less than \$5,000.

6 **REQUEST FOR ADMISSION NO. 74:**

7 Admit that for the tax year 1999, your income was less than \$10,000.

8 **REQUEST FOR ADMISSION NO. 75:**

9 Admit that for the tax year 1999, your income was less than \$15,000.

10 **REQUEST FOR ADMISSION NO. 76:**

11 Admit that for the tax year 1999, your income was less than \$20,000.

12 **REQUEST FOR ADMISSION NO. 77:**

13 Admit that for the tax year 1999, your income was less than \$25,000.

14 **REQUEST FOR ADMISSION NO. 78:**

15 Admit that for the tax year 1999, your income was less than \$50,000.

16 **REQUEST FOR ADMISSION NO. 79:**

17 Admit that for the tax year 1999, your income was less than \$75,000.

18 **REQUEST FOR ADMISSION NO. 80:**

19 Admit that for the tax year 1999, your income was less than \$100,000.

20 **REQUEST FOR ADMISSION NO. 81:**

21 Admit that for the tax year 1999, your income was less than \$200,000.

22 **REQUEST FOR ADMISSION NO. 82:**

23 Admit that for the tax year 1999, your income was less than \$250,000.

24 **REQUEST FOR ADMISSION NO. 83:**

25 Admit that for the tax year 1999, your income was less than \$500,000.

26 **REQUEST FOR ADMISSION NO. 84:**

27 Admit that for the tax year 1999, your income was less than \$1 million.

28 ///

1 **REQUEST FOR ADMISSION NO. 85:**

2 Admit that for the tax year 2000, your income was less than \$5,000.

3 **REQUEST FOR ADMISSION NO. 86:**

4 Admit that for the tax year 2000, your income was less than \$10,000.

5 **REQUEST FOR ADMISSION NO. 87:**

6 Admit that for the tax year 2000, your income was less than \$15,000.

7 **REQUEST FOR ADMISSION NO. 88:**

8 Admit that for the tax year 2000, your income was less than \$20,000.

9 **REQUEST FOR ADMISSION NO. 89:**

10 Admit that for the tax year 2000, your income was less than \$25,000.

11 **REQUEST FOR ADMISSION NO. 90:**

12 Admit that for the tax year 2000, your income was less than \$50,000.

13 **REQUEST FOR ADMISSION NO. 91:**

14 Admit that for the tax year 2000, your income was less than \$75,000.

15 **REQUEST FOR ADMISSION NO. 92:**

16 Admit that for the tax year 2000, your income was less than \$100,000.

17 **REQUEST FOR ADMISSION NO. 93:**

18 Admit that for the tax year 2000, your income was less than \$200,000.

19 **REQUEST FOR ADMISSION NO. 94:**

20 Admit that for the tax year 2000, your income was less than \$250,000.

21 **REQUEST FOR ADMISSION NO. 95:**

22 Admit that for the tax year 2000, your income was less than \$500,000.

23 **REQUEST FOR ADMISSION NO. 96:**

24 Admit that for the tax year 2000, your income was less than \$1 million.

25 **REQUEST FOR ADMISSION NO. 97:**

26 Admit that for the tax year 2001, your income was less than \$5,000.

27 **REQUEST FOR ADMISSION NO. 98:**

28 Admit that for the tax year 2001, your income was less than \$10,000.

1 **REQUEST FOR ADMISSION NO. 99:**

2 Admit that for the tax year 2001, your income was less than \$15,000.

3 **REQUEST FOR ADMISSION NO. 100:**

4 Admit that for the tax year 2001, your income was less than \$20,000.

5 **REQUEST FOR ADMISSION NO. 101:**

6 Admit that for the tax year 2001, your income was less than \$25,000.

7 **REQUEST FOR ADMISSION NO. 102:**

8 Admit that for the tax year 2001, your income was less than \$50,000.

9 **REQUEST FOR ADMISSION NO. 103:**

10 Admit that for the tax year 2001, your income was less than \$75,000.

11 **REQUEST FOR ADMISSION NO. 104:**

12 Admit that for the tax year 2001, your income was less than \$100,000.

13 **REQUEST FOR ADMISSION NO. 105:**

14 Admit that for the tax year 2001, your income was less than \$200,000.

15 **REQUEST FOR ADMISSION NO. 106:**

16 Admit that for the tax year 2001, your income was less than \$250,000.

17 **REQUEST FOR ADMISSION NO. 107:**

18 Admit that for the tax year 2001, your income was less than \$500,000.

19 **REQUEST FOR ADMISSION NO. 108:**

20 Admit that for the tax year 2001, your income was less than \$1 million.

21 **REQUEST FOR ADMISSION NO. 109:**

22 Admit that for the tax year 2002, your income was less than \$5,000.

23 **REQUEST FOR ADMISSION NO. 110:**

24 Admit that for the tax year 2002, your income was less than \$10,000.

25 **REQUEST FOR ADMISSION NO. 111:**

26 Admit that for the tax year 2002, your income was less than \$15,000.

27 **REQUEST FOR ADMISSION NO. 112:**

28 Admit that for the tax year 2002, your income was less than \$20,000.



1 **REQUEST FOR ADMISSION NO. 113:**

2 Admit that for the tax year 2002, your income was less than \$25,000.

3 **REQUEST FOR ADMISSION NO. 114:**

4 Admit that for the tax year 2002, your income was less than \$50,000.

5 **REQUEST FOR ADMISSION NO. 115:**

6 Admit that for the tax year 2002, your income was less than \$75,000.

7 **REQUEST FOR ADMISSION NO. 116:**

8 Admit that for the tax year 2002, your income was less than \$100,000.

9 **REQUEST FOR ADMISSION NO. 117:**

10 Admit that for the tax year 2002, your income was less than \$200,000.

11 **REQUEST FOR ADMISSION NO. 118:**

12 Admit that for the tax year 2002, your income was less than \$250,000.

13 **REQUEST FOR ADMISSION NO. 119:**

14 Admit that for the tax year 2002, your income was less than \$500,000.

15 **REQUEST FOR ADMISSION NO. 120:**

16 Admit that for the tax year 2002, your income was less than \$1 million.

17 **REQUEST FOR ADMISSION NO. 121:**

18 Admit that for the tax year 2003, your income was less than \$5,000.

19 **REQUEST FOR ADMISSION NO. 122:**

20 Admit that for the tax year 2003, your income was less than \$10,000.

21 **REQUEST FOR ADMISSION NO. 123:**

22 Admit that for the tax year 2003, your income was less than \$15,000.

23 **REQUEST FOR ADMISSION NO. 124:**

24 Admit that for the tax year 2003, your income was less than \$20,000.

25 **REQUEST FOR ADMISSION NO. 125:**

26 Admit that for the tax year 2003, your income was less than \$25,000.

27 **REQUEST FOR ADMISSION NO. 126:**

28 Admit that for the tax year 2003, your income was less than \$50,000.

1 **REQUEST FOR ADMISSION NO. 127:**

2 Admit that for the tax year 2003, your income was less than \$75,000.

3 **REQUEST FOR ADMISSION NO. 128:**

4 Admit that for the tax year 2003, your income was less than \$100,000.

5 **REQUEST FOR ADMISSION NO. 129:**

6 Admit that for the tax year 2003, your income was less than \$200,000.

7 **REQUEST FOR ADMISSION NO. 130:**

8 Admit that for the tax year 2003, your income was less than \$250,000.

9 **REQUEST FOR ADMISSION NO. 131:**

10 Admit that for the tax year 2003, your income was less than \$500,000.

11 **REQUEST FOR ADMISSION NO. 132:**

12 Admit that for the tax year 2003, your income was less than \$1 million.

13 **REQUEST FOR ADMISSION NO. 133:**

14 Admit that for the tax year 2004, your income was less than \$5,000.

15 **REQUEST FOR ADMISSION NO. 134:**

16 Admit that for the tax year 2004, your income was less than \$10,000.

17 **REQUEST FOR ADMISSION NO. 135:**

18 Admit that for the tax year 2004, your income was less than \$15,000.

19 **REQUEST FOR ADMISSION NO. 136:**

20 Admit that for the tax year 2004, your income was less than \$20,000.

21 **REQUEST FOR ADMISSION NO. 137:**

22 Admit that for the tax year 2004, your income was less than \$25,000.

23 **REQUEST FOR ADMISSION NO. 138:**

24 Admit that for the tax year 2004, your income was less than \$50,000.

25 **REQUEST FOR ADMISSION NO. 139:**

26 Admit that for the tax year 2004, your income was less than \$75,000.

27 **REQUEST FOR ADMISSION NO. 140:**

28 Admit that for the tax year 2004, your income was less than \$100,000.

1 **REQUEST FOR ADMISSION NO. 141:**

2 Admit that for the tax year 2004, your income was less than \$200,000.

3 **REQUEST FOR ADMISSION NO. 142:**

4 Admit that for the tax year 2004, your income was less than \$250,000.

5 **REQUEST FOR ADMISSION NO. 143:**

6 Admit that for the tax year 2004, your income was less than \$500,000.

7 **REQUEST FOR ADMISSION NO. 144:**

8 Admit that for the tax year 2004, your income was less than \$1 million.

9 **REQUEST FOR ADMISSION NO. 145:**

10 Admit that for the tax year 2005, your income was less than \$5,000.

11 **REQUEST FOR ADMISSION NO. 146:**

12 Admit that for the tax year 2005, your income was less than \$10,000.

13 **REQUEST FOR ADMISSION NO. 147:**

14 Admit that for the tax year 2005, your income was less than \$15,000.

15 **REQUEST FOR ADMISSION NO. 148:**

16 Admit that for the tax year 2005, your income was less than \$20,000.

17 **REQUEST FOR ADMISSION NO. 149:**

18 Admit that for the tax year 2005, your income was less than \$25,000.

19 **REQUEST FOR ADMISSION NO. 150:**

20 Admit that for the tax year 2005, your income was less than \$50,000.

21 **REQUEST FOR ADMISSION NO. 151:**

22 Admit that for the tax year 2005, your income was less than \$75,000.

23 **REQUEST FOR ADMISSION NO. 152:**

24 Admit that for the tax year 2005, your income was less than \$100,000.

25 **REQUEST FOR ADMISSION NO. 153:**

26 Admit that for the tax year 2005, your income was less than \$200,000.

27 **REQUEST FOR ADMISSION NO. 154:**

28 Admit that for the tax year 2005, your income was less than \$250,000.

1 **REQUEST FOR ADMISSION NO. 155:**

2 Admit that for the tax year 2005, your income was less than \$500,000.

3 **REQUEST FOR ADMISSION NO. 156:**

4 Admit that for the tax year 2005, your income was less than \$1 million.

5 **REQUEST FOR ADMISSION NO. 157:**

6 Admit that for the tax year 2006, your income was less than \$5,000.

7 **REQUEST FOR ADMISSION NO. 158:**

8 Admit that for the tax year 2006, your income was less than \$10,000.

9 **REQUEST FOR ADMISSION NO. 159:**

10 Admit that for the tax year 2006, your income was less than \$15,000.

11 **REQUEST FOR ADMISSION NO. 160:**

12 Admit that for the tax year 2006, your income was less than \$20,000.

13 **REQUEST FOR ADMISSION NO. 161:**

14 Admit that for the tax year 2006, your income was less than \$25,000.

15 **REQUEST FOR ADMISSION NO. 162:**

16 Admit that for the tax year 2006, your income was less than \$50,000.

17 **REQUEST FOR ADMISSION NO. 163:**

18 Admit that for the tax year 2006, your income was less than \$75,000.

19 **REQUEST FOR ADMISSION NO. 164:**

20 Admit that for the tax year 2006, your income was less than \$100,000.

21 **REQUEST FOR ADMISSION NO. 165:**

22 Admit that for the tax year 2006, your income was less than \$200,000.

23 **REQUEST FOR ADMISSION NO. 166:**

24 Admit that for the tax year 2006, your income was less than \$250,000.

25 ///

26 ///

27 ///

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1 **REQUEST FOR ADMISSION NO. 167:**

2 Admit that for the tax year 2006, your income was less than \$500,000.

3 **REQUEST FOR ADMISSION NO. 168:**

4 Admit that for the tax year 2006, your income was less than \$1 million.

5  
6 DATED: December 20, 2007

FRANSCCELL, STRICKLAND,  
ROBERTS & LAWRENCE, P.C.

7  
8  
9 By



Aaron M. Fontana

Attorneys for Defendants

10 CITY OF INGLEWOOD, INGLEWOOD  
11 POLICE DEPARTMENT, FORMER  
12 POLICE CHIEF RONALD BANKS,  
13 OFFICERS RAFAEL RODRIGUEZ, JOSE  
14 BARRAGAN, ANDY BARILLAS and  
15 EDUARDO SANCHEZ  
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**PROOF OF SERVICE**

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I, Fely Yamane, am employed in the aforesaid County, State of California; I am over the age of 18 years and not a party to the within action; my business address is 100 West Broadway, Suite 1200, Glendale, CA 91210.

On December 20, 2007, I served the foregoing **DEFENDANT CITY OF INGLEWOOD'S REQUEST FOR ADMISSIONS TO PLAINTIFF ALTHEA LEDFORD, SET ONE** the interested parties in this action by placing a true copy thereof, enclosed in a sealed envelope, addressed as follows:

Wilmer J. Harris  
Peggy Roman-Jacobson  
Schonbrun DeSimone Seplow Harris & Hoffman  
414 South Marengo Avenue  
Pasadena, CA 91101

BY U.S. MAIL as follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice, it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at Glendale, California, in the ordinary course of business.

I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct, and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on December 20, 2007, at Glendale, California.

  
Declarant